



OIL SPILL PREPAREDNESS DIVISION MANUAL:

Standard Operating Procedures
for 30 CFR §254 Regulatory Activities





UDHOE BAY, AK

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OSPD Manual Introduction

Purpose

The Department of the Interior, Bureau of Safety and Environmental Enforcement (BSEE), Oil Spill Preparedness Division (OSPD) has developed standard operating procedures (SOPs)—known collectively as the “OSPD Manual”—for applying current regulatory authorities uniformly throughout the nation. These internal agency guidelines, processes and other requirements for OSPD employees apply to offices in the three operational and geographically distinct regions (Gulf of Mexico, California and Alaska) and the headquarters component located in Sterling, VA.

The OSPD Manual establishes consistent guidelines for existing processes, and details entirely new processes not previously managed by OSPD but within OSPD regulatory authority. The OSPD Manual also provides a process for administrative record creation that is easily manageable, provides a detailed record of decision and greatly increases the efficiency of congressional inquiry processes and/or other governmental transparency requests. Written plainly enough for new employees, the SOPs within the OSPD Manual also work for experienced OSPD regulators by clearly organizing oil spill preparedness concepts and requirements. The OSPD Manual shall be utilized in all three distinct operational regions, is adaptable, and adds value to, but does not exceed or replace existing OSPD promulgated regulations: *30 CFR §254: Oil-Spill Response Requirement for Facilities Located Seaward of the Coast Line (30 CFR §254)*.

Organization

In order to organize and categorize key elements of OSPD’s mission for the creation of the SOPs, the OSPD Manual utilizes language and concepts from the Presidential Policy Directive 8 (PPD-8), which sets forth the National Preparedness Goal. The National Preparedness Goal (available at: <http://www.dhs.gov/presidential-policy-directive-8-national-preparedness>)



Figure Intro-2. Visual representation of the relationships between strategic framework and goals, OSPD regulatory obligations, core capabilities and their corresponding standard operating procedures.



defines the core capabilities necessary to prepare for specific types of incidents that pose the greatest risk to the security of the Nation and emphasizes actions aimed at achieving an integrated, layered, and all-of-Nation preparedness approach that optimizes the use of available resources. A secure and resilient Nation has the capabilities required across the whole community to prevent, protect against, mitigate, respond to, and recover from the threats and hazards that pose the greatest risk. Additionally, the National Preparedness Goal defines core capabilities necessary to prepare for incidents that pose the greatest risk to the security of the Nation.

By ensuring offshore facility owners/operators meet the oil spill response preparedness standards set forth by 30 CFR §254, OSPD plays a key role in national preparedness of the U.S. To that end, the OSPD Manual is organized around five core capabilities (and a separate SOP for enforcement) that include individual SOPs within each of the five core capabilities. Each capability and corresponding SOPs establish internal policies and processes by which OSPD employees will operate on a day-to-day basis.

Each of the five core capabilities and enforcement procedures were drafted to ensure consistency and continuity with BSEE’s mission, vision and organizational values. Additionally, the individual SOPs adhere conceptually to the two strategic goals as per BSEE’s Strategic Plan for Fiscal Years 2012-2015 (see Table Intro-1). These strategies and goals define a clear pathway for each OSPD core capability, and assist in determining the boundary of actions for each SOP. As the strategic plan states, “All BSEE employees will ultimately have a connection between the work that they do, whether it be in the OCS or in the Washington, D.C. area, and the strategies that follow.” Ultimately, the OSPD Manual is the daily operational ‘instruction manual’ for how OSPD will act as it fulfills its mission and vision concurrently with other BSEE personnel.

BSEE FY 2012-2015 Strategic Goals	
Strategic Goal 1:	Strategic Goal 2:
<p>Regulate, enforce, and respond to OCS development using the full range of authorities, policies, and tools to compel safety, emergency preparedness, and environmental responsibility and appropriate development and conservation of the offshore oil and natural gas resources.</p> <ul style="list-style-type: none"> ✓ Properly define, assess, and differentiate risks ✓ Build clear, consistent, comprehensive, and effective permitting processes ✓ Create, define, and expand regulatory approaches and tools ✓ Refine and enhance continuous offshore safety and environmental performance 	<p>Build and sustain the organizational, technical, and intellectual capacity within and across BSEE’s key functions – capacity that keeps pace with OCS industry technological improvements, innovates in regulation and enforcement, and reduces risk through systemic assessment and regulatory and enforcement actions.</p> <ul style="list-style-type: none"> ✓ Human capital, transformation: recruiting, training, and retaining to reflect the increasing expertise needed ✓ Technology and information management investment: revamp data systems, knowledge management, and research and innovation

Table Intro-1. BSEE’s Strategic Plan for Fiscal Years 2012-2015

Training

In order to assist with the internal promulgation of the OSPD Manual, an informative pamphlet and several PowerPoint presentations have been developed. These tools, in conjunction with the OSPD Manual itself, shall be used as an initial introduction for OSPD personnel to daily operational requirements. The OSPD Manual, pamphlet and presentations are considered introductory and cannot be the sole basis for OSPD personnel training and continuing education.

Annual Review and Revision

The OSPD Chief has full responsibility to promulgate, update, or change the content of the OSPD Manual. Within 30 days of the OSPD Manual becoming official policy, the OSPD Chief shall develop an electronic tool (e.g., spreadsheet, database) to collect and organize suggested changes or updates to the content of the OSPD Manual. The OSPD Chief shall make informational requirements for suggested changes and updates very clear to OSPD personnel and those managing the suggested changes and updates collection tool. There are two ways the OSPD Manual can be updated; the preferred method is the annual review and revision process that makes permanent physical changes to the language of the OSPD Manual. The second, less preferred method is the use of policy statements that addresses the issue immediately, but does not incorporate permanent language into the OSPD Manual itself.

The first method involves the creation of an internal review board that meets annually to discuss potential revisions and provide recommendations on language to be incorporated into the OSPD Manual. On the 12-month anniversary of the OSPD Manual becoming official policy, the OSPD Chief shall convene an OSPD Manual Review Board. The OSPD Manual Review Board will meet within 30 days of the 12-month anniversary of the OSPD Manual becoming official policy and at a minimum be made up of the following OSPD personnel:

- one representative from the Gulf Oil Spill Preparedness Section,
- one representative from the California Oil Spill Preparedness Section,
- one representative from the Alaska Oil Spill Preparedness Section,
- one representative from the OSPD HQ office (other than the OSPD Preparedness Verification Branch Chief or the OSPD Chief),
- OSPD Preparedness Verification Branch Chief, and
- OSPD Chief.

The OSPD Manual Review Board's sole purpose is to review and discuss all suggested content changes or updates. Once a decision is made to accept or decline a suggested change or update, the reasons for that decision shall be noted within the suggested changes and updates collection tool. The suggested changes collection tool will become the administrative record and historical decision document for the entire lifespan of the OSPD Manual. All recommended changes and updates approved by the OSPD Manual Review Board shall be integrated into the OSPD Manual, informational pamphlet and training presentations within 60 days from the convening of the OSPD Manual Review Board.

This process will repeat itself on every 12-month anniversary date from the date the OSPD Manual became official internal OSPD policy.

The second method involves the use of policy statements written by the OSPD Chief that can update, amend or change policy within the OSPD Manual immediately. The use of policy statements is common among federal regulatory agencies as a way to provide immediate changes to internal policy that can't wait for the more formal change review process. OSPD personnel may recommend to the OSPD Chief, via their supervisors, immediate changes requiring a policy statement. When making a recommendation, OSPD personnel must provide sound reasoning as to why the changes should not wait for the annual OSPD Manual review and revision process.

Regulatory Responsibilities and Relationships

There are several key relationships among those that have regulatory responsibilities under 30 CFR §254. Across all of the OSPD Manual capabilities, the following terms are used: plan holder, owner/operator, OSRP/regional OSRP and offshore facility or facility. For the purposes of this manual, OSRP and regional OSRP are synonymous, unless purposely distinguished by regulation or some other external document. Also, unless otherwise specified, plan holders and owner/operators are synonymous and define the same entity responsible for 30 CFR §254 compliance. This is consistent with 30 CFR §254.1(a):

Who must submit a spill-response plan? If you are the owner or operator of an oil handling, storage, or transportation facility, and it is located seaward of the coast line, you must submit a spill-response plan to BSEE for approval. Your spill-response plan must demonstrate that you can respond quickly and effectively whenever oil is discharged from your facility. Refer to § 254.6 for the definitions of "oil," "facility," and "coast line" if you have any doubts about whether to submit a plan.

There are exceptions to this hierarchy that are allowable under 30 CFR §254.3(a). In some cases, a plan holder's¹ OSRP covers multiple affiliated owners/operators. This also may mean that those plan holders maintain multiple OSRPs. Before conducting any regulatory activity under this Manual, the applicable OSRP or regional OSRP relationship hierarchy shall be documented. OSPD personnel must be cognizant of these specific variances to the regulatory relationship hierarchy as it may influence regulatory activities and OSPD's decision-making process in some limited cases.

Programmatic Regulatory Authority

OSPD's legal authorities and required operational capabilities for the mission of OCS facility oil spill preparedness originate from 30 CFR §254. There is also the required connectivity to the National Response System (NRS), specifically 40 CFR §175(a):

During preparedness planning or in an actual response, various federal agencies may be called upon to provide assistance in their respective areas of expertise, as indicated in paragraph (b) of this section, consistent with agency legal authorities and capabilities.

¹ The plan holder may be a parent company that does not own any facilities or it may be a company that owns facilities and has other affiliated companies.

The NRS identifies BSEE's legal authorities and capabilities within 40 CFR §175(b)(9)(v):

Minerals Management Service [BSEE]: Oversight of offshore oil and gas exploration and production facilities under the Outer Continental Shelf Lands Act and the CWA; oil spill response technology research; and establishing oil discharge contingency planning requirements for offshore facilities.

Capability Target and Metrics

Capability targets and metrics are performance threshold(s) for each core capability that will guide OSPD's allocation of resources to support national preparedness for oil spills originating from OSPD's regulated offshore facilities. For each of the five core capabilities and enforcement, capability targets and associated metrics and the additional resources needed to achieve these metrics shall be determined within 120 days of the OSPD Manual becoming official policy.

The OSPD Chief shall utilize the 120 days following the initial internal promulgation of the OSPD Manual to clearly define capabilities targets and metrics. Data shall be collected on the targets and metrics once they are established utilizing the least resource intensive method available. This shall include identification of the appropriate system or software for raw data collection, the appropriate reporting form, system or software to communicate interpreted data, and to clearly define the need to know requirements for data shared both up the chain of command and/or out to the regulated community.

Records Management

Records management is the responsibility of each OSPD Section. OSPD supervisors and the OSPD Chief shall work closely together to determine the best methodology for records management with an eye towards the specific needs of each Section and the information management software utilized by each Section. The OSPD Chief shall have final say on any issues or concerns that arise from records management procedures enacted by OSPD personnel. The OSPD Chief may stipulate records management procedures via an OSPD Manual Policy Statement at anytime.

Internal Policy Consistency Audits

In order to ensure consistent quality of regulatory information required to be collected and managed by OSPD personnel, the OSPD Chief may initiate, at anytime for any reason, an internal policy consistency audit. The internal policy consistency audit is designed to ensure that promulgation of the OSPD Manual has been consistent across the OSPD Sections, information is being collected, processed and managed consistent with OSPD Manual requirements and that regulatory authority is not exceeded or under utilized.

The OSPD Chief, via an audit memorandum, initiates internal policy consistency audits and has sole discretion on the scope, breadth and depth of the audit. Internal policy consistency audits may be done remotely or in person. If the scope of the audit requires additional resources, an audit team may be created. The audit team may include any OSPD employee as long as those employees are not assigned within the Section being audited at the time of the audit. The OSPD Chief may choose

to provide details regarding the scope of the audit to the appropriate OSPD supervisor prior to initiating any action and the OSPD supervisor may provide feedback on the need for an audit. However; only the OSPD Chief can make changes to the audit or stop an audit from taking place.

The OSPD Manual imposes no separate duties on facility owners or operators other than the requirements contained within 30 CFR §254. If there appears to be a conflict between what is stated in this guidance and what is stated in the regulatory requirements, 30 CFR §254 shall be followed. The statements in this document are intended solely as guidance. This document is not intended and cannot be relied upon to create rights, substantive or procedural, enforceable by any party in litigation with the United States.





Section I - OSRP Review
Capability (ORC):
Standard Operating Procedure



Introduction

Environmental stewardship refers to responsible use and protection of the natural environment through conservation and sustainable practices. The Oil Spill Response Plan (OSRP) is one of the most important aspects of ensuring to the American public that offshore energy exploration and production are activities that foster environmental stewardship. When Bureau of Safety and Environmental Enforcement (BSEE's) Oil Spill Preparedness Division (OSPD) personnel approve an OSRP, it is telling the American public that the owner/operator (O/O) of an offshore facility has demonstrated the ability to respond to a worst case discharge (WCD) to the maximum extent practicable. To that end, the OSRP Review Capability Standard Operating Procedures (SOPs), in concert with the BSEE's FY 2012–2015 Strategic Goals, have created a comprehensive system for OSRP review that:

- provides objective, justifiable, and documented verification of the offshore oil industry's oil spill preparedness, as directed by 30 CFR §254,
- guides the regulatory and administrative focus of OSPD employee activities by detailing clear OSRP review direction inside established legal boundaries,
- ensures administrative consistency across the entire life cycle of an OSRP, and
- develops an administrative record of decisions for every OSPD regulatory activity.

Ultimately, all regulatory actions taken by OSPD personnel should document connectivity back to an OSRP. The OSPD's paradigm should always reflect activities necessary for verification of an O/O's preparedness to respond to their WCD oil spill.

Background

Accepting, reviewing, processing, and managing hundreds of OSRPs in the three OSPD Sections presents opportunities for process improvement by OSPD personnel. Managing the OSRP compliance program within OSPD has many process challenges. For instance, after initial submission and approval, OSRPs must be reviewed at least every 2 years, and remain approved until they are rescinded by OSPD. There is no other limitation on the revision frequency for the plan holder; however, there are certain preparedness conditions that require the plan holder to submit a revision to their approved OSRP. OSPD may review a plan at anytime and require the plan holder to submit a revision if the plan has become out of date and/or difficult to use. OSPD may also require a revision to an approved OSRP if significant inadequacies are identified. It is incumbent upon OSPD to carefully maintain approved OSRP content compliance, as well as version control for all submitted plans and revisions.

OSRPs are lengthy documents, many exceeding 500 pages, and many details within each section and appendices of the OSRPs must be reviewed to verify that important information is correct. However, the review must also verify that the OSRP taken as a whole adequately demonstrates that an O/O is prepared to contain and recover an offshore facility's WCD to the maximum extent practicable.



The OSPD Manual's Review Capability SOPs must ensure that OSPD personnel comprehensively verify the accuracy of information in each OSRP section and appendix, and then document such action within the administrative record for future reference. Further, regular verification of the calculation for WCD scenarios must occur, as it is a driver for the overall response capability requirements for the OSRP. Additionally, verification for consistency with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and local Area Contingency Plans (ACP) is often facilitated through review by outside agencies such as the U.S. Coast Guard (USCG).

Goals. The goal of these SOPs is to provide a nationwide standardized OSRP review process that seamlessly manages OSPD's OSRP review regulatory requirements. The OSRP Review Capability detailed here does this by establishing a form-based, simple, and comprehensive system of review that:

- creates a standardized OSRP review vocabulary
- minimizes workload impact to OSPD personnel
- does not require database software or other information management systems
- utilizes forms easily integrated with new data management systems
- adapts to mobile technology for potential field use
- creates an administrative record of all reviewer actions and decisions
- connects to all other OSPD 30 CFR §254 regulatory activities
- includes a rescission process that completes the OSRP life cycle
- establishes an OSPD consultation process

In order to better organize distinct regulatory activities within the OSRP Review Capability, regulatory activities are broken out into three individual SOPs:

1. Receiving and reviewing an OSRP (ORC-1)
2. OSPD Consultations (ORC-2)
3. OSRP Rescissions (ORC-3)

Each SOP has specific tasks related to the overall process of monitoring regulatory compliance with OSRP requirements. The following regulatory tasks and associated processes are covered by the SOPs as follows:

1. Receiving an OSRP (ORC-1)
 - a. Conducting a Phase I review
 - b. Assigning an OSPD Preparedness Analyst
 - c. Tracking progress of individual OSRP reviews within the queue



2. Reviewing an OSRP (ORC-1)
 - a. Initial OSRP Review (30 CFR §254.2(a))
 - b. OSRP Revision Processes (30 CFR §254.30)
 - c. WCD certifications (30 CFR §254.2(b))
 - d. NCP and ACP consistency reviews
 - e. Plan exercise requirements review
 - f. OSRP point of contact verification
3. OSPD Consultations (ORC-2)
 - a. Applicable OSRP consultations for Exploration Plans (EPs)/Development and Production Plans (DPPs)/Development Operations and Coordination Documents (DOCDs) and Application for Permit to Drill (APDs)
4. OSRP Rescissions (ORC-3)
 - a. Voluntary Rescissions
 - b. Involuntary Rescissions

The OSRP Review capability includes the following forms:

1. Receiving an OSRP (ORC-1)
 - a. OSRP Review Docket Control Cover Sheet
2. Reviewing an OSRP (ORC-1)
 - a. OSRP Master Review Matrices (MRM)
 - i. MRM Index
 - ii. MRM Subpart A
 - iii. MRM Subpart B
 - iv. MRM Subpart C
 - v. MRM Subpart D
 - vi. MRM Continuation
 - b. OSRP Reviewer's Quick Reference Guide
 - c. ACP Consistency Worksheet
 - d. Triennial Exercise Cycle: Compliance Worksheet
 - e. WCD Verification Worksheet
 - f. Points of Contact Verification Worksheet
 - g. OSRP Review: Submission Disposition



There are two job functions that OSPD personnel are required to fulfill in order to execute the OSRP Plan Review Capability as described within the SOPs:

Plans Coordinator: Personnel who provide administrative assistance to the entire OSRP review process. This individual tracks all submitted OSRPs, assigns OSRP reviews based on workload, tracks the number of days OSRPs are in the review queue, ensures OSRPs are reviewed in the required timeframe, and reviews, packages, and submits for delivery all official correspondence regarding the OSRPs to and from the planholder. The Plans Coordinator also ensures that all plans are filed according to regulations, creates and manages the OSPD tracking numbers for all plan reviews, and manages the OSRP docket filing system, both manually and electronically. If applicable, the administrative assistant should assist the plans coordinator as necessary or as his/her daily functions allow.

Preparedness Analyst: Personnel who provide all plan review functions for each Section beyond those duties established for the Plans Coordinator. Preparedness Analysts are the primary points of contact for any OSRPs assigned to them for review. Analysts are responsible for any timelines associated with plan review and work closely with the Plans Coordinator(s) to ensure that all plans are reviewed promptly and thoroughly.

These job functions may be performed by the same individual or the responsibilities may be divided among personnel of different grade levels and/or experience.

Plan Review Guidance: Nomenclature

Preparedness Analysts are free to work within the procedural system provided here, so long as all documents are utilized to provide an administrative record of actions that must be taken by policy to ensure that a thorough OSRP Review has been completed. Preparedness Analysts may create their own crosswalks or other systems to assist them with their plan review so long as it does not change the review processes and administrative record creation as defined by this SOP. It is recommended that reviewers read the entire OSRP prior to each review in order to get a feel for the workability of the document. This action will also allow for the greatest flexibility in understanding the overall structure and content of the plan. Ensuring workability, or documenting lack of usability and inadequacies are essential to the various OSRP revision processes defined by 30 CFR §254.30.

The analyst should keep in mind the basic reasons why the Federal Government requires these plans from O/O's of facilities located seaward of the coastline:

1. To demonstrate that the O/O has ensured, by contract or other acceptable means, that the response resources necessary to respond to their WCD to the maximum extent practicable are readily available to them.
2. To determine if the information upon which the O/O and offshore facility personnel would rely on in the event of a spill is accurate, their assumptions are based in reality, and the equipment listed in the OSRP is appropriate for that particular environment.
3. To ensure that, in the event of a spill, the facility O/O's approved OSRP will work to effectively respond to a WCD to the maximum extent practicable.



After the Preparedness Analyst has been assigned an OSRP, he/she should read through the plan and critically evaluate the entire plan as outlined within this SOP. This is done by utilizing the Master Review Matrix for each subpart of 30 CFR §254, first under a Phase II Preliminary Review to confirm that the basic plan requirements from 30 CFR §254 are found within the plan. Once completed, a Phase III Preparedness Review should seek to determine how effectively Notice to Lessees and Operators No. 2012-N06 recommendations are implemented. This SOP establishes and further defines how the various OSRP review phases and scopes are used to complete a thorough OSRP review.

Once OSPD approves an OSRP, it is always approved until it is rescinded. Once approved, an OSRP may be reviewed by OSPD at any time, for any reason. Within an approved OSRP life cycle, the OSRP may either be in-compliance or not-in-compliance at any given time. In order for an OSRP to be in-compliance it must meet all regulatory requirements. If the Preparedness Analyst determines that the plan does not meet all applicable regulatory requirements, then the plan is determined to be not-in-compliance and corrective and/or enforcement actions shall be initiated. The OSRP remains approved regardless of any on-going corrective action, revision process or enforcement action.

OSRP Review Phases and Scope

The OSRP Review Capability SOPs define different phases of a complete OSRP review, where each stage of review builds on the last. Each of those phases are numbered and labeled as follows:

Phase I Completeness Review: First stage of OSRP review process (review queue) that looks to verify that the submitted OSRP has all the component parts before it is placed into the review queue.

Phase II Preliminary Review: Second stage of OSRP review that verifies that the plan holder has met all the requirements found in 30 CFR §254.

Phase III Preparedness Review: Third and final stage of OSRP review that verifies that the plan holder has met all the requirements found in 30 CFR §254 and that any NTL recommendations have been incorporated properly. This phase requires a comprehensive look at the plan to ensure that the plan holder can respond to the maximum extent practicable.

Additionally, Phase II and III reviews include three distinct 'scope' levels to ensure that OSPD personnel have maximum flexibility when reviewing OSRPs. The following OSRP review scopes are defined below:

Full Review: An OSRP review that requires the entire document to be examined and evaluated.

Partial Review: A less than full OSRP review that requires certain sections or distinct aspects of the plan to be examined and evaluated, but does not require a full review to determine plan holder preparedness compliance.

Targeted Review: A less than partial OSRP review that requires specific pages or distinct paragraphs of text to be examined and evaluated for consistency, but does not require a partial or full review to determine plan holder preparedness compliance.



The Preparedness Analyst may change the review scope (full, partial, targeted) based on the OSRP or revision to be reviewed. The Preparedness Analyst may self-determine what review scope to utilize when assigned an OSRP to review, utilizing the following guidelines:

1. Initial OSRPs must always include at least one full review; subsequent amendments of the initial plan (i.e., revisions received by OSPD prior to approval of the initial OSRP) may require a targeted, partial or full review, depending on the type and extent of the changes to the OSRP.
2. Within 30 days of the submittal of modifications resulting from a review performed to comply with 30 CFR §254.30(a), or a letter indicating no modifications are necessary, the OSRP must be either partially or fully reviewed by a Preparedness Analyst to determine if any revisions should be required by OSPD in accordance with 30 CFR §254.30 (c) or (e). The decision whether to perform a full or partial review should consider the length of time that has passed since the last full review, e.g., if a full review has been performed within the last year, a partial review may be sufficient. OSPD personnel should note that compliance acknowledgement for 30 CFR §254.30(a) is a distinct regulatory action from the partial or full review that must follow a 30 CFR §254.30(a) submission.
3. Revisions submitted in accordance with 30 CFR §254.30(b) may require a targeted, partial or full review, depending on the type and extent of the changes to the OSRP.
4. Revisions submitted by a plan holder as a result of directions received from OSPD in accordance with 30 CFR §254.30(c) or (e) may require a targeted, partial or full review, depending on the type and extent of the required revision(s) to the OSRP.

Subsequent revisions, for purposes of determining OSRP review scope, means those OSRP revision submissions received by OSPD in direct response to the compliance outcome of the most recent review by OSPD personnel.

As previously mentioned, an OSRP may be reviewed by OSPD at any time, for any reason. In order to ensure oil spill preparedness accuracy, fairness in the regulatory process, and decisional transparency to the plan holder, each and every review that OSPD conducts on an OSRP shall be a distinct and separate regulatory action with its own administrative record.

Plan Review Guidance: Revision Requirements by 30 CFR §254.30

The OSRP life cycle includes four different revision categories as defined by 30 CFR §254.30. Each revision category includes its own unique processes, nomenclature and official correspondence language. However, when the Preparedness Analyst conducts the actual OSRP review, he/she must utilize the processes outlined within this SOP. This section of the SOP sets forth regulatory actions required by revisions within an OSRP life cycle and how OSPD communicates the compliance results to the plan-holder.

It is important to note that revisions do not invalidate former versions of the OSRP or change the approval status of the OSRP. A revision only provides new information that must be considered when evaluating the O/O's ability to respond. If OSPD determines at any time that an OSRP revision



negatively impacts the O/O's ability to respond, OSPD will take appropriate action to ensure that the O/O remains prepared to respond to a WCD to the maximum extent practicable.

Prior to any OSRP review, Preparedness Analysts are required to review the revision history carefully to ensure that the applicable OSRP docket control sheet has correctly documented the OSRP life cycle. The OSPD internally maintained docket control sheet and the revision history located within each approved OSRP are expected to match to the maximum extent practicable. On occasion, plan holders submit revisions to approved OSRPs without self-identifying the revision category. Preparedness Analysts are encouraged to communicate with the plan holder to properly identify every OSRP revision submitted to OSPD. Once clarified by the plan holder, this should be documented in the administrative record and the OSRP docket control sheet. There are four revision categories, broken out by regulatory citation from 30 CFR §254.30: 30(a), 30(b), 30(c) and 30(e). The individual processes management for the four revision categories are described in detail below.

Revision Categories

- a. *30 CFR §254.30(a) You must review your response plan at least every 2 years and submit all resulting modifications to the OSPD Chief. If this review does not result in modifications, you must inform the OSPD Chief in writing that there are no changes.*

Preparedness Analysts are instructed to no longer use the term “biennial review” when describing compliance with 30 CFR §254.30(a). The term “biennial review” falsely implies that the review must take place every two years. In reality, the plan holder may conduct a 30 CFR §254.30(a) review as many times as they want, but at a minimum must review the entire plan at least every 2 years. This revision category is technically NOT part of OSPD's OSRP review process, it is OSPD's assurance that the plan holder is fully reviewing the plan regularly, or at a minimum every 2 years.

Compliance with 30 CFR §254.30(a) is evaluated using a three pronged test:

1. Did the plan holder state affirmatively that they reviewed their entire plan or state that the submittal is for compliance with 30 CFR 254.30(a)?
2. Did the plan holder provide any modifications or state that no changes were made?
3. Did the plan holder do both 1 and 2 at least once within two years?

If the plan holder did not meet these threshold requirements when submitting a 30 CFR §254.30(a) OSRP revision, then the plan holder is not-in-compliance and is subject to corrective and/or enforcement actions. As noted previously, plan holders may review their entire plan as many times as they want and each time they meet the three prong test above, they shall receive a new “review by date” for this revision category. OSPD shall verify the three-prong test threshold for every 30 CFR §254.30(a) submission.

Recall that plan holders that submit modifications in compliance with 30 CFR §254.30(a) must have their OSRP partially or fully reviewed by a Preparedness Analyst within 30 days from the submittal date. OSPD personnel should note that compliance acknowledgement for 30 CFR §254.30(a) is a distinct regulatory action from the partial or full review that must follow a 30 CFR §254.30(a) submission.



While it is up to the plan holder to ensure that they fully review their plan at least once every two years, it is incumbent on OSPD to appropriately manage each new 30 CFR §254.30(a) submission deadline date or “review by date”. Plan holders shall receive a new “review by date” two years from the day the plan holder indicates that they have reviewed their entire response plan, and provided the necessary modifications, or indicate that there are no changes since the most recent verified 30(a) submission, approved 30(b), or in-compliance notice under the 30(c) or 30(e) revision categories.

When communicating with the plan holder regarding 30 CFR §254.30(a) compliance, OSPD does not accept or approve 30 CFR §254.30(a) submissions. The plan holder has either met all the requirements or not met all the requirements and is therefore in-compliance or not-in-compliance. Below is recommended language for Preparedness Analysts when managing 30 CFR §254.30(a) submissions:

If plan holder states no changes were made following their review:

On ____, we received your letter informing us that you reviewed your Oil Spill Response Plan (OSRP) and did not make any changes. This submission is in compliance with requirements in 30 CFR §254.30(a).

You must review your OSRP within the next two years and no later than ____ (two years from date submitted). If you have any questions regarding this letter, contact ____ at ____.

If modifications were made and communicated:

On ____ we received modifications resulting from your review of your Oil Spill Response Plan (OSRP). This submission is in compliance with requirements in 30 CFR §254.30(a).

You must review your OSRP within the next two years and no later than ____ (two years from date submitted). If you have any questions regarding this letter, contact ____ at ____.

If modifications submitted are “not complete”:

On ____ we received notification that you reviewed your Oil Spill Response Plan (OSRP) and the resulting modifications. During an internal verification process we determined that you did not submit all resulting modifications. This submission is not in compliance with the requirements in 30 CFR §254.30(a).

You must review your OSRP and submit modifications no later than ____ (date from last complete submission). If you have any questions regarding this letter, contact ____ at ____.

- b. *30 CFR §254.30(b) You must submit revisions to your plan for approval within 15 days whenever: (1) A change occurs which significantly reduces your response capabilities; (2) A significant change occurs in the worst case discharge scenario or in the type of oil being handled, stored, or transported at the facility; (3) There is a change in the name(s) or capabilities of the oil spill removal organization cited in the plan; or (4) There is a significant change to the Area Contingency Plan(s).*





Compliance with this OSRP revision category is self-initiated by the plan holder and/or O/O. They are required to tell OSPD when there is an operational condition that meets one of the threshold criteria found within 30 CFR §254.30(b). Preparedness Analysts are encouraged to assist plan holders and/or O/Os upon request, if there are specific questions regarding the threshold criteria. NTL No. 2013-N02 specifically addresses 30 CFR §254.30(b)(2) and should be utilized by the regulated community to the maximum extent practicable to self-determine OSPD revision compliance.

All 30 CFR §254.30(b) OSRP revisions must be approved by OSPD. 30 CFR §254.30(b) OSRP submission approvals are granted on a case-by-case basis and quantitative one-size-fits-all guidance is not provided here. Preparedness Analysts shall conduct a thorough review of the 30 CFR §254.30(b) OSRP revision and determine compliance based on all available facts at the time of the review. Below is recommended language for Preparedness Analysts when managing 30 CFR §254.30(b) submission approvals:

30 CFR §254.30(b)(1): If the revision addresses the change that occurred which significantly reduced response capabilities and the capabilities are in compliance.

On ____ we received your revisions to the approved regional Oil Spill Response Plan (OSRP) for _____ by letter dated _____. In accordance with 30 CFR §254.30(b)(1), you revised your OSRP to indicate a change which significantly reduces your response capabilities. These revisions are approved.

30 CFR §254.30(b)(1): If the revision addresses the change that occurred which significantly reduced response capabilities and the capabilities are NOT in compliance with 30 CFR §254 (i.e. capabilities are not maximum extent practicable).

On ____ we received your revisions to the approved regional Oil Spill Response Plan (OSRP) for _____ by letter dated _____. In accordance with 30 CFR §254.30(b)(1), you revised your OSRP to indicate a change which significantly reduces your response capabilities. These revisions are not approved. Our review of your revisions indicates a significant inadequacy in your OSRP. Under our authority in 30 CFR §254.30(e), we hereby require you to revise your OSRP to include a description of the response equipment that you will use to ensure your worst case discharge (WCD) is contained and recovered to the maximum extent practicable. You must submit this revision to OSPD in ____ days.

30 CFR §254.30(b)(2): If the revision addresses a significant change in the WCD scenario or in the type of oil being handled stored or transported at the facility and the OSRP revision is in compliance.

On ____ we received your revisions to the approved regional Oil Spill Response Plan (OSRP) for _____ by letter dated _____. In accordance with 30 CFR §254.30(b)(2), you revised your OSRP to indicate a change in the worst case discharge (WCD) [choose scenario/or the type of oil being handled stored or transported at the facility]. These revisions are approved.

30 CFR §254.30(b)(2): If the revision addresses a significant change in the WCD scenario or in the type of oil being handled stored or transported at the facility and is NOT in compliance with 30 CFR §254 (i.e. capabilities are not maximum extent practicable).



On ____ we received your revisions to the approved regional Oil Spill Response Plan (OSRP) for _____ by letter dated _____. In accordance with 30 CFR §254.30(b)(2), you revised your OSRP to indicate a change in the worst case discharge (WCD) [choose scenario/or the type of oil being handled stored or transported at the facility]. These revisions are not approved. Our review of your revisions indicates a significant inadequacy in your OSRP. Under our authority in 30 CFR 254.30(e), we hereby require you to revise your OSRP to address the [WCD scenario/or the type of oil being handled stored or transported at the facility] and include a description of the response equipment that you will use to ensure your worst case discharge (WCD) is contained and recovered to the maximum extent practicable. You must submit this revision to OSPD in ____ days.

30 CFR §254.30(b)(3): If the revision addresses a change in the name(s) or capabilities of the oil spill removal organization cited in the plan and the OSRP revision is in compliance.

On ____ we received your revisions to the approved regional Oil Spill Response Plan (OSRP) for _____ by letter dated _____. In accordance with 30 CFR §254.30(b)(3), you revised your OSRP to indicate a change in the name(s) or capabilities of the oil spill removal organization cited in the plan. These revisions are approved.

30 CFR §254.30(b)(3): If the revision addresses a change in the name(s) or capabilities of the oil spill removal organization cited in the plan and is NOT in compliance with 30 CFR §254 (i.e. capabilities are not maximum extent practicable).

On ____ we received your revisions to the approved regional Oil Spill Response Plan (OSRP) for _____ by letter dated _____. In accordance with 30 CFR §254.30(b)(3), you revised your OSRP to indicate a change in the name(s) or capabilities of the oil spill removal organization cited in the plan. These revisions are not approved. Our review of your revisions indicates a significant inadequacy in your OSRP. Under our authority in 30 CFR 254.30(e), we hereby require you to revise your OSRP to address the change in the name(s) or capabilities of the oil spill removal organization cited in the plan and include a description of the response equipment that you will use to ensure the worst case discharge (WCD) is contained and recovered to the maximum extent practicable. You must submit this revision to OSPD in ____ days.

30 CFR §254.30(b)(4): If the revision addresses a significant change to the Area Contingency Plan(s) and the OSRP revision is in compliance.

On ____ we received your revisions to the approved regional Oil Spill Response Plan (OSRP) for _____ by letter dated _____. In accordance with 30 CFR §254.30(b)(4), you revised your OSRP to address a significant change to the Area Contingency Plan(s). These revisions are approved.

30 CFR §254.30(b)(4): If the revision addresses a significant change to the Area Contingency Plan(s) and is NOT in compliance with 30 CFR §254 (i.e. OSRP is not consistent with ACP or capabilities are not maximum extent practicable):

On ____ we received your revisions to the approved regional Oil Spill Response Plan (OSRP) for _____ by letter dated _____. In accordance with 30 CFR §254.30(b)(4), you revised your OSRP to address a significant change to the Area Contingency Plan(s). These revisions are not approved. Our review of your revisions indicates a significant inadequacy in your OSRP. Under



our authority in 30 CFR 254.30(e), we hereby require you to revise your OSRP to ensure the response equipment that you will use to contain and recover the worst case discharge to the maximum extent practicable aligns with the change(s) to the Area Contingency Plan(s). You must submit this revision to OSPD in ____ days.

c. *30 CFR §254.30(c) The OSPD Chief may require that you resubmit your plan if the plan has become outdated or if numerous revisions have made its use difficult.*

d. *30 CFR §254.30(d) The OSPD Chief will periodically review the equipment inventories of OSRO's to ensure that sufficient spill removal equipment is available to meet the cumulative needs of the owners and operators who cite these organizations in their plans.*

30 CFR §254.30(e) The OSPD Chief may require you to revise your plan if significant inadequacies are indicated by: (1) Periodic reviews (described in 30 CFR §254.30(d)); (2) Information obtained during drills or actual spill responses; or (3) Other relevant information the OSPD Chief obtained.

Unlike the previous OSRP revision categories, it is up to the OSPD Preparedness Analyst to determine if a 30 CFR §254.30(c) or 30 CFR §254.30(e) revision is required. Preparedness Analysts should utilize the appropriate regulatory language when establishing that the plan holder must revise their OSRP. The revision threshold requirement is unique for 30 CFR §254.30(c) and 30 CFR §254.30(e). The threshold requirement to justify a plan holder to revise their OSRP under 30 CFR §254.30(c) authority is that the plan has become outdated or if numerous revisions have made the OSRP difficult to use.

The threshold requirement to justify a plan holder to revise their OSRP under 30 CFR §254.30(e) authority hinges on the term “significant inadequacies”. The Preparedness Analyst must identify significant inadequacies related to periodic reviews as defined in 30 CFR §254.30(d), information obtained in drills or actual responses, or other relevant information that OSPD has obtained. Revision thresholds may be based on individual significant inadequacies, the cumulative impact of errors leading to an overall significant inadequacy (30 CFR §254.30(e)), or an outdated and unusable plan (30 CFR §254.30(c)). If there are several errors, but only one significant inadequacy, OSPD shall request all errors be addressed. See the section entitled Plan Review Guidance: Documenting Plan Errors within this SOP for more information on OSRP review error identification.

The Preparedness Analyst has the authority to review any plan at any time for any reason, and evaluate an OSRP's efficacy to respond to the worst case discharge to the maximum extent practicable. OSRP revision category (e) gives OSPD the most flexibility to ensure the plan is effective in its totality. It provides a ‘catch-all’ authority that OSPD should use when appropriate. Requiring plan holders to revise their approved OSRPs utilizing 30 CFR §254.30(c) and 30 CFR §254.30(e) authority shall be done on a case-by-case basis and quantitative one-size-fits-all guidance is not provided here.

Preparedness Analysts shall ensure that 30 CFR §254.30(c) and 30 CFR §254.30(e) correspondence to plan holders requiring an OSRP revision include a 30, 60 or 90 day deadline, dependent on the revision complexity. Below is recommended language for Preparedness Analysts when managing required revisions utilizing 30 CFR §254.30(c) and 30 CFR §254.30(e) authority:



30 CFR §254.30(c): If, for whatever well documented reason, OSPD determines a plan has become outdated or if numerous revisions have made its use difficult to the point that a response to the maximum extent practicable would likely be significantly impeded, send the following statement.

Initiating Statement: OSPD has determined your plan has become outdated or difficult to use from numerous revisions per our authority in 30 CFR §254.30(c). Specifically, you must address the following: (list outdated sections or specific issues related to numerous revisions here). You must resubmit your plan to OSPD by ____.

Response if resubmitted plan met the requirement established in the initiating statement: On ____ we received your resubmitted ____ OSRP. This plan is in compliance with 30 CFR §254.

30 CFR §254.30(e) Initiating Statement: OSPD has determined your plan has significant inadequacies per our authority in 30 CFR §254.30(e). Specifically, you must address the following: (list significant inadequacies here). You must resubmit your plan to OSPD by ____.

Response if resubmitted plan meet the requirement established the initiating statement: On ____ we received your required revision to ____ OSRP. This plan is in compliance with 30 CFR §254.

The Preparedness Analyst should strive to list the “significant inadequacies” as succinctly as possible within the body of the letter. **Do not include the error type or qualifier, tables, or reprint other sections that need to be revised**, simply cite the regulatory requirement that is deficient and add any necessary amplifying information. The Preparedness Analyst should also be careful not to use the generic term “issues” to identify problems within the OSRP, there are only “significant inadequacies”. See the section entitled *Plan Review Guidance: Documenting Plan Errors* within this SOP for more information on OSRP review error identification.

OSRP Version Control Management

If the plan holder submits modifications to their approved OSRP without referring to the regulatory requirement for the modifications, OSPD will initiate contact with the plan holder or their representative and discern if there is a regulatory requirement for the modifications to be submitted to OSPD. If the plan holder informs OSPD that it does not meet any of the 30 CFR §254.30 revision requirements, OSPD shall:

1. Internally document that a “non-regulatory/info-only submittal” was received.
2. Ensure proper version control utilizing Section specific methodology.
3. Respond to the plan holder stating that OSPD received the “non-regulatory/info-only submittal” and state that the “review by date” on file has not changed. OSPD should be clear to the plan holder that their “review by date” shall NOT change unless a verified 30(a) submission is documented.



Plan Review Guidance: Documenting Plan Errors

Very specific and standardized language shall be used to document plan errors discovered by OSPD Preparedness Analysts. These errors will then be reported back to plan holders via official correspondence. This is done to ensure consistency among reviewers, to avoid confusion from the regulated community and their contractors, and to reinforce the notion that this plan belongs to the O/O.

When conducting an OSRP review, the Preparedness Analyst should file assessments and decision making facts resulting from the OSRP review within the official administrative record. This SOP stipulates the methods, forms and information that must be collected to conduct a proper OSRP review. By design, the OSRP Review SOPs require Preparedness Analysts to comment only on inadequacies or other negative conditions within the plan. However, the Preparedness Analyst has autonomy with regards to what is written within the forms to describe the identified OSRP inadequacies or other negative conditions. Therefore, it is important that Preparedness Analysts not provide independent solutions, alternate analysis or disseminate information to the plan holder and/or the O/O that they should be developing themselves. Preparedness Analysts should share their recommendations when applicable to a regulatory requirement. OSPD is ensuring that the OSRP meets the regulatory requirements as promulgated by 30 CFR §254, and OSPD should not pre-determine strategy and tactics for the regulated community. Additionally, Preparedness Analysts must practice brevity to ensure that OSPD is not dictating plan operations or functions, misstating regulatory requirements, or creating new regulatory requirements. Overall, OSRP revision review correspondence should reflect our desire to work with the regulated community, and not to do their work for them or educate them about regulatory compliance requirements.

A note on what constitutes appropriate language and communication to the regulated community when conducting OSRP reviews: Analysts shall assume that every word they write will be read by the general public.

Finally, OSRP review dockets should not display personal opinions or unsupported conclusions. They should contain only information that is directly related to the OSRP review history contained within the docket itself. The details of the OSRP review docket should be completed and all remarks should be relative to the actual review and supported by sound and relevant documentation. Note that recommendations for change are not, by themselves, enough for the regulated community to make the change. All entries, narratives, comments, or conclusions made by the Preparedness Analyst when conducting an OSRP review shall be supported by regulatory requirements. Missing or additional required information does not need to be supplied by the Preparedness Analyst, however, the analyst should make a good faith effort to ensure clear communication to the plan holder as to how the specified information can be found and/or obtained. Every statement or other similarly prepared OSRP review document included in the OSRP review administrative record should have a signature or e-signature of the person who prepared the document.

Within the Master Review Matrix forms for each 30 CFR §254 subpart, there is ample space for Preparedness Analysts to write comments, identify errors, and/or note conclusions or concepts that need to be questioned or documented better by the plan holder. As stated previously, comments that document errors, negative conditions and/or significant inadequacies shall be standardized, direct, and as brief as possible.



Error Types and Qualifiers

The following are the three types of errors and their corresponding abbreviated error code that can be identified during an OSRP review:

Technical Errors (T): Incorrect use of terminology or some other specific incorrect issue peculiar to, or characteristic of, established oil spill preparedness concepts, standards, and/or methodologies.

Regulatory Errors (R): Misinterpretation of or clear noncompliance with applicable regulatory requirements (does not include NTLs).

Preparedness Errors (P): Disregard or misapplication of broader preparedness concepts found within standard industry guidelines, regulation, and NTLs.

Preparedness Analysts should further describe any errors by using the following error qualifiers and their corresponding abbreviated error qualifier code:

- Missing/Incomplete (MI)
- Incorrect/False (IF)
- Methodology Unsupported (MU)
- Inconsistent (IX)
- Improper Use (IU)

Proper Error Documentation

There are several ways that plan errors are documented by OSPD within the OSRP docket and administrative record. The master review matrices are designed for 'in-review' comments; this is the first place that an error is documented. The master review matrices force the Preparedness Analyst to establish quickly where the error was found, what regulatory requirement the error is associated with and/or what NTL recommendations were not properly followed. Once an OSRP review is completed, the Preparedness Analyst will complete the submission disposition form for the review. This form summarizes all errors identified by the OSRP review and does not provide details regarding the error. This provides the plan holder several ways to learn about the plan review results. The submission disposition form summarizes all errors, organized by regulatory and NTL recommendations, and the master review matrices are where plan holders and/or plan writers can go to get greater detail on individual errors.

Here is an example of proper error documentation: the Preparedness Analyst identified a technical error within the Master Review Matrix for subpart B. The error should document that the equipment owner is not listed with the response equipment as part of the plan holder's ability to contain and recover a discharge from their facility. This is most likely an omission that does not change the overall evaluation of the plan holder's preparedness to respond. However, the error must be identified. An example comment for this specific error within the master review matrix for Subpart B is as follows:



“Plan holder failed to detail the owner of the equipment identified in Appendix H. Regulatory error: Missing/Incomplete ownership data within Appendix H response equipment listing.”

An example entry for this specific error within the submission disposition form is as follows:

“See MRM-B pg. X for Appendix H pg. X error: R-MI, No owner listed for equipment.”

In general, comments during OSRP review should resemble these examples. Whenever possible, the analyst should identify where the error is documented in the master review matrices and where the error actually is within the OSRP. The language used to describe the error itself should be clear, concise and not assume facts not in evidence, nor seek to assume obvious ownership. The Preparedness Analyst must simply identify errors and broadly assist the regulated community with regulatory compliance, as well as ensure that the OSRP demonstrates that the plan holder can respond to their WCD to the maximum extent practicable. Ultimately, nationwide consistency in comments and feedback to the regulated community is important, as it prepares the regulated community and their contractors to have ownership in building, testing, and executing their plan.

As noted in the OSRP revisions section of this SOP, single regulatory errors or the cumulative effect of technical errors may meet the significant inadequacy threshold for a Preparedness Analyst to require an OSRP revision.

OSRP Plan Review Process

Step-by-step OSRP Review instructions are provided in the following tables:

- ORC-1, Table 1-1: Receiving and Reviewing an Initial OSRP
- ORC-1, Table 1-2: Plan Holder Initiated OSRP Review (includes 30(a) and 30(b) revisions)
- ORC-1, Table 1-3: OSPD Initiated OSRP Review (includes 30(c) and 30(e) revisions)

Other processes that may require a distinct OSRP review not related to the initial review or revision requirements and are not directly covered by the ORC flowchart:

- ORC-3, Table 1-4: Rescission Process for Approved OSRPs



Receiving and Reviewing an Initial OSRP

SOP ORC-1		Task Duty: Plans Coordinator
Task #	Regulatory Task/Sub-Task	Form or Letter
1.1	Receive an Initial OSRP from an Owner/Operator.	
1.2	Send notice to plan holder confirming new OSRP was received.	Letter or Email
1.3	Create new OSRP review docket and OSPD Tracking number.	Docket Control Cover Sheet
1.4	Begin Phase I Review.	Master Review Matrices (A/B/C/D)
1.5	Does the OSRP pass or fail the Phase I review?	
1.5.a	If plan failed Phase I, return the OSRP to plan holder.	OSRP Incomplete Submittal Letter
1.5.b	If plan passes Phase I, assign an OSPD Preparedness Analyst.	
SOP ORC-2		Task Duty: Preparedness Analyst
Task #	Regulatory Task/Sub-Task	Form or Letter
1.6	Determine Phase II review scope.	Docket Control Cover Sheet
1.7	Conduct Phase II review.	Master Review Matrices (A/B/C/D)
1.8	Determine Phase III review scope.	Docket Control Cover Sheet
1.9	Conduct Phase III review.	Master Review Matrices (A/B/C/D)
1.9.a	Complete WCD verification.	WCD Verification Worksheet
1.9.b	Complete point of contact verification.	Points of Contact Verification Worksheet
1.9.c*	Complete Area Contingency Plan consistency evaluation.	Area Contingency Plan Consistency Evaluation Worksheet
*NOTE	Task 1.9.c must be completed for the following reasons: a new OSRP, an increase in the WCD volume, or a decrease in response capability. In all other instances, this task is optional. However, Preparedness Analysts may exceed these minimum external review requirements on a case-by-case basis.	
1.9.d	Complete the triennial exercise requirement evaluation.	Triennial Exercise Cycle Worksheet
1.10	Review all forms and complete a thorough OSRP evaluation.	OSRP review forms
1.11	Document OSRP Review final disposition.	Submission Disposition



1.12	Are changes/updates required prior to approval?	
1.12.a	If no, send official documents, no further action.	OSRP review forms and approval letter
1.12.b	If yes, do the identified error(s) indicate a significant inadequacy as described in 30 CFR §254.30(e)?	
1.12.b.1	If no, send official documents, go to task 1.14.	OSRP review forms and approval ltr.
1.12.b.2	If yes, send official documents, initiate 30(e) revision.	Review forms, revision required ltr.
1.13	When OSRP revision is submitted, initiate a new review activity and administrative record and utilize Table 1-1.	
1.14	Once changes/updates are incorporated, no further action.	OSRP Review Forms
SOP ENF-1		Task Duty: Preparedness Analyst / Enforcement Coordinator
Task #	Regulatory Task/Sub-Task	Form or Letter
1.15	Is an enforcement action warranted from any of the above tasks?	
1.15.a	If yes, reference Enforcement SOP.	INC Package Forms: IRC and ENF SOPs
1.15.b	If no, then no further enforcement action should be taken.	

Table 1-1. Receiving and Reviewing an Initial OSRP



Plan Holder Initiated OSRP Review		
SOP ORC-1		Task Duty: Plans Coordinator
Task #	Regulatory Task/Sub-Task	Form or Letter
2.1	Receive 30 CFR §254.30(a) OSRP submission or receive notice that OSRP revision is necessary in compliance with 30 CFR §254.30(b).	
2.2	Obtain OSRP docket and, if necessary, document compliance with 30 CFR §254.30(a).	If applicable, 30(a) compliance letter
2.3	Conduct Phase I review.	Master Review Matrices (A/B/C/D)
2.4	Assign an OSPD Preparedness Analyst.	Docket Control Cover Sheet
SOP ORC-2		Task Duty: OSPD Preparedness Analyst
Task #	Regulatory Task/Sub-Task	Form or Letter
2.5	Determine scope of Phase II review.	Docket Control Cover Sheet
2.6	Conduct Phase II review.	Master Review Matrices (A/B/C/D)
2.7	Determine scope of Phase III review.	Docket Control Cover Sheet
2.8	Conduct Phase III review.	Master Review Matrices (A/B/C/D)
2.8.a	Complete WCD verification.	WCD Verification Worksheet
2.8.b	Complete point of contact verification.	Points of Contact Verification Worksheet
2.8.c*	Complete Area Contingency Plan consistency evaluation.	Area Contingency Plan Consistency Evaluation Worksheet
*NOTE	Task 2.8.c must be completed for the following reasons: a new OSRP, an increase in the WCD volume, or a decrease in response capability. In all other instances, this task is optional. However, Preparedness Analysts may exceed these minimum external review requirements on a case-by-case basis.	
2.8.d	Complete the triennial exercise requirement evaluation.	Triennial Exercise Cycle Worksheet
2.9	Review all forms and complete a thorough OSRP evaluation.	OSRP review forms
2.10	Document OSRP Review final disposition.	Submission Disposition



2.11	Are further revisions required?	
2.11.a	If no, send official documents. No further action.	OSRP review forms and, if applicable, 30(b) approval letter
2.11.b	If yes, does the 30 CFR §254.30(b) submission contain insufficient information, does the identified error(s) make the OSRP outdated or difficult to use per 30 CFR §254.30(c), or does the identified errors indicate a significant inadequacy per 30 CFR §254.30(e)?	Review forms, revision required letter
2.12	When OSPD required revision is submitted, initiate a new review activity and administrative record and utilize Table 1-3.	OSRP review forms
SOP ENF-1		Task Duty: Preparedness Analyst / Enforcement Coordinator
Task #	Regulatory Task/Sub-Task	Form or Letter
2.13	Is an enforcement action warranted from any of the above tasks?	
2.13.a	If yes, reference Enforcement SOP.	ENF SOP
2.13.b	If no, then no further enforcement action should be taken.	INC Package Forms: IRC and ENF SOPs

Table 1-2. Plan Holder Initiated OSRP Review (includes 30 CFR §254.30(a) and §254.30(b) revisions)





OSPD Initiated OSRP review

SOP ORC-1		Task Duty: OSPD Personnel
Task #	Regulatory Task/Sub-Task	Form or Letter
3.1	Does OSPD have information that suggests an OSRP should be reviewed? Does new information suggest that an approved OSRP needs additional review?	
3.2	Obtain the OSRP docket, review revision history.	Docket Control Cover Sheet
3.3	Begin Phase I review (optional task).	Master Review Matrices (A/B/C/D)
3.4	Assign an OSPD Preparedness Analyst.	Docket Control Cover Sheet
SOP ORC-2		Task Duty: OSPD Preparedness Analyst
Task #	Regulatory Task/Sub-Task	Form or Letter
3.5	Determine scope of Phase II review: Targeted, partial or full	Docket Control Cover Sheet
3.6	Conduct Phase II review.	Master Review Matrices (A/B/C/D)
3.7	Determine scope of Phase III review: Targeted, partial or full.	Docket Control Cover Sheet
3.8	Conduct Phase III review.	Master Review Matrices (A/B/C/D)
3.9.a	Complete WCD verification.	WCD Verification Worksheet
3.9.b	Complete point of contact verification.	Points of Contact Verification Worksheet
3.9.c*	Complete Area Contingency Plan consistency evaluation.	Area Contingency Plan Consistency Evaluation Worksheet
*NOTE	Task 3.9.c must be completed for the following reasons: a new OSRP, an increase in the WCD volume, or a decrease in response capability. In all other instances, this task is optional. However, Preparedness Analysts may exceed these minimum external review requirements on a case-by-case basis.	
3.9.d	Complete the triennial exercise requirement evaluation.	Triennial Exercise Cycle Worksheet
3.10	Review all forms and complete a thorough OSRP evaluation.	OSRP review forms



OSPD Initiated OSRP review		
3.11	Document OSRP Review final disposition.	Submission disposition form
3.12	Did the Preparedness Analyst identify error(s) that make the OSRP outdated or difficult to use per 30 CFR §254.30(c), or identify errors that indicate a significant inadequacy per 30 CFR §254.30(e)?	
3.13	If no, do not send official documentation, no further action.	OSRP review forms
3.14	If yes, send revision request letter.	Review forms, revision required letter
3.15	When OSPD required revision is submitted, initiate a new review activity and administrative record and go to task 3.1.	
SOP ENF-1		Task Duty: Preparedness Analyst / Enforcement Coordinator
Task #	Regulatory Task/Sub-Task	Form or Letter
3.16	Is an enforcement action warranted from any of the above tasks?	
3.16.a	If yes, reference Enforcement SOP.	SOP: ENF
3.16.b	If no, then no further enforcement action should be taken.	INC Package Forms: IRC and ENF SOPs

Table 1-3: *OSPD Initiated OSRP Review (includes 30(c) and 30(e) revisions)*



ORC-2: OSPD Consultation

OSPD consultations may occur as part of the review of a proposed Exploration Plan (EP), Development and Production Plan (DPP), or Development Operations Coordination Document (DOCD) and/or because of a change in WCD volume identified during the review of an Application for Permit to Drill (APD). OSPD consultations are expected to request interpretive information with regards to an applicable OSRP. It is incumbent upon OSPD personnel to manage expectations of the requesting agency, as OSPD shall only provide very specific information related to the applicable OSRP. EP, DPP or DOCD consultations will originate from the Bureau of Ocean Energy Management (BOEM) or BSEE depending on the plan and APD consultations will originate from the appropriate BSEE office.

For the EP/DPP/DOCD processes, 30 CFR §550.219 and .250 reference the need for information regarding potential spills of oil and hazardous substances and make a distinction between those O/O's that provide an OSRP to accompany the EP/DPP/DOCD (30 CFR §550.219/.250(a)(1)) and those that refer to an approved Regional OSRP (30 CFR §550.219/.250(a)(2)).

30 CFR §550.219(a) and .250(a)(1): Oil spill response planning. The material required under paragraph (a)(1) or (a)(2) of this section: (1) An OSRP for the facilities you will use to conduct your proposed development and production activities prepared according to the requirements of 30 CFR part 254, subpart B; or (2) Reference to your approved Regional OSRP (see 30 CFR 254.3 to include: (i) A discussion of your regional OSRP; (ii) The location of your primary oil spill equipment base and staging area; (iii) The name(s) of your oil spill removal organization(s) for both equipment and personnel; (iv) The calculated volume of your worst case discharge scenario (see 30 CFR 254.26(a)), and a comparison of the appropriate worst case discharge scenario in your approved regional OSRP with the worst case discharge scenario that could result from your proposed development and production activities; and (v) A description of the worst case oil spill scenario that could result from your proposed development and production activities (see 30 CFR 254.26(b), (c), (d), and (e)).

For O/Os that provide an OSRP to accompany the EP/DPP/DOCD, OSPD personnel should take the following action:

1. Determine, on a case-by-case basis, what constitutes 'prepared' for the requestor or assist the requestor in determining what constitutes 'prepared' utilizing the list below:
 - a. WCD Scenario (30 CFR §254.26)
 - b. Potential sensitive site impact list
 - c. List of equipment
 - d. Any other factor agreed upon by the requestor and OSPD personnel
2. Answer any questions the requesting agency has, as it relates to the OSRP or regional OSRP via email, do not speculate or make contingent approval statements.
3. Coordinate with the appropriate BSEE office to ensure OSPD is notified when an APD associated with the EP/DPP/DOCD is submitted to BSEE in order to ensure that an O/O is not operating without an approved OSRP or regional OSRP (or a written certification



that they have the capability to respond, to the maximum extent practicable, to their WCD, submitted to OSPD in accordance with 30 CFR 254.2(b).).

4. See Note 1 and 3 below.

For the O/Os that refer to an approved Regional OSRP, OSPD personnel should take the following action:

1. Determine if the well in question falls under the scope of an approved Regional OSRP.
2. Determine if the equipment list found within the EP/DPP/DOCD aligns with the Regional OSRP.
3. Determine if the EP/DPP/DOCD WCD volume leads to a scenario that requires additional capabilities.
4. Answer any questions the requesting agency has, as it relates to the OSRP or Regional OSRP via email, do not speculate or make contingent approval statements.
5. Coordinate with other BSEE offices to ensure that OSPD is notified when an APD related to the EP/DPP/DOCD is submitted in order to ensure that an O/O is not operating without an approved OSRP or regional OSRP (or a written certification that they have the capability to respond, to the maximum extent practicable, to their WCD, submitted to OSPD in accordance with 30 CFR 254.2(b).).
6. See Note 2 and 3 below.

NOTE-1: OSPD shall coordinate with BOEM whenever possible although the coordination process may differ slightly among BSEE Sections. OSPD will not approve a pre-decisional OSRP submitted with an EP/DPP/DOCD. OSPD may also need to assist BOEM in order educate external regulators that BOEM may not need a fully developed and approved OSRP to make determinations regarding National Environmental Policy Act (NEPA) requirements. Other requirements such as those pertaining to the Coastal Zone Management Act shall be determined on a case-by-case basis. OSPD personnel should make themselves available to BOEM or other external agencies for consultations that utilize a pre-decisional OSRP for NEPA analysis.

The O/O must meet all OSRP requirements before OSPD can approve an OSRP. BOEM may utilize a draft OSRP and consult with OSPD in order to make NEPA determinations. OSPD has sole responsibility for determining if the O/O is prepared to respond to an oil spill to the maximum extent practicable.

NOTE-2: For instances where OSPD receives information that a WCD volume has changed, OSPD personnel must first review the applicable OSRP in order to provide appropriate consultation. OSPD personnel must answer one primary question: does the OSRP demonstrate that the O/O has adequate capabilities to respond to the new scenario resulting from the new volume?

If yes, OSPD shall email the requestor saying that the capabilities are adequate to respond to the scenario resulting from the new WCD volume and no further action is necessary.

If no, the approved OSRP or regional OSRP remains approved, however, a revision must be submitted within 15 days after the APD is submitted. The revision must be approved by OSPD



before the APD can be approved, and before operations can begin. OSPD personnel should coordinate with other BSEE offices to determine when an APD is submitted by the O/O.

NOTE-3: This policy should be followed whenever possible. However, if there is disagreement between this policy and any currently valid SOPs, memorandums of understanding (MOUs) and/or memorandums of agreement (MOAs), compliance with those applicable agreements should take precedence.

ORC-3: OSRP Rescissions

The life cycle of an OSRP is fairly simple. Once initially approved, an OSRP stays approved, irrespective of how many revisions are conducted. OSRP revision is a separate regulatory process that does not supersede any other permit or plan approval process. Rescinding an OSRP represents the end of the life cycle of an OSRP and is the only time after it has been initially approved that an OSRP can be rendered invalid.

There are two ways that an OSRP can be rescinded—by request of the plan holder (voluntary) or by actions initiated by OSPD personnel (involuntary). Table 1-4 below describes the step-by-step process for both voluntary and involuntary OSRP rescissions. The majority of rescinded OSRPs come after a transfer of offshore facilities from one O/O to another. In fact, many involuntary rescissions may come from the need to conduct “housekeeping” on various OSRPs to ensure that every offshore facility and/or O/O has an applicable and approved OSRP on file. Maintaining proper ownership information for each OSRP is of paramount importance. The transfer of operatorship by BOEM is generally the first notice OSPD personnel will have that a commercial transaction of some kind has occurred. OSPD should stay abreast of legal transfers of operations from one O/O to another and initiate proper OSRP rescission actions as necessary with the appropriate O/O. In some rare instances, an OSRP may be involuntarily rescinded due to gross regulatory non-compliance.

Once an OSRP has been identified for rescission, the entire OSRP docket must be reviewed for accuracy. OSRP rescissions should not take place without a full evaluation of the risks or potential unintended regulatory consequences. If the OSRP has incomplete information, the O/O must be informed of the issue as soon as possible. The Preparedness Analyst shall utilize a pre-rescission corrective action letter that identifies and communicates all the issues that an O/O must resolve prior to getting an OSRP rescinded. While there is no regulatory timeline to enforce rescission activities, OSPD should communicate the consequences of rescinding an OSRP that may cover another active facility or having improper or incomplete information within an approved OSRP.

If OSPD Preparedness Analysts discover substantial incomplete or incorrect information, the analyst may initiate a revision package from the O/O as per 30 CFR §254.30(c) or (e). This should only be done if the revision itself is necessary to complete an OSRP rescission, or to ensure that related OSRPs are not rendered ineffective due to the rescission itself. Information on how to initiate required OSRP revisions is found in the “Plan Review Guidance: Revision Requirements by 30 CFR §254.30” section above. Refer to Table 1-4 for step-by-step instructions and details regarding the voluntary and involuntary OSRP rescission process.



OSRP Voluntary and Involuntary Rescission Process

SOP ORC-3		Task Duty: OSPD Preparedness Analyst
Task #	Regulatory Task/Sub-Task	Form or Letter
4.1	Receive or discover information that sufficiently informs the need to initiate a potential OSRP rescission.	Applicable OSRP Docket on file
4.2	Obtain all files related to OSRP docket.	OSRP Docket on file
4.3	Verify that all related offshore facilities include accurate and updated information.	OSRP Docket on file
4.4	If all of the information is correct, draft rescission letter for supervisor review and signature.	OSRP Rescission Letter
4.5*	Once rescission letter is signed and delivered to O/O, copy shall be placed in OSRP docket and the rescission control sheet filled out and placed in the docket. No further action is necessary.	OSRP Rescission Control Sheet and Docket on file
*NOTE	Ensure OSRP docket file is clearly marked “rescinded” and that the docket is segregated from active OSRPs.	
4.6*	If incomplete, incorrect, or invalid information exists, draft a letter requesting pre-rescission corrective action.	Pre-Rescission Corrective Action Letter
*NOTE	If the OSRP rescission is initiated due to offshore facilities being sold from one O/O to another, OSPD shall generally work with the seller. The buyer is involved only as necessary.	
4.7	As necessary, consult and/or coordinate with other bureaus or agencies to ensure that the O/O completes the corrective action request within a reasonable timeframe.	Pre-Rescission Corrective Action Letter
4.8	If rescission process is delayed, ensure compliance with 30 CFR §254.30 and coordinate requested revision processes for any applicable OSRPs.	
4.8.a	If no other options exist for obtaining O/O cooperation on voluntary rescission, coordinate with supervisor for best course of action.	
4.9	Once pre-rescission corrective actions are complete, draft rescission letter for supervisor review and signature.	OSRP Rescission Letter



4.10*	Once rescission letter is signed and delivered to O/O, copy shall be placed in OSRP docket. No further action is necessary.	OSRP Docket on file
*NOTE	Ensure OSRP docket file is clearly marked “rescinded” and that the docket is segregated from active OSRPs.	
4.11	Is an enforcement action warranted from any of the above tasks?	
4.11.a	If yes, reference Enforcement SOP.	SOP: ENF
4.11.b	If no, then no further enforcement action should be taken.	INC Package Forms: IRC and ENF SOPs

Table 1-4. *Rescission Process for Approved OSRPs*



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**Section 2 - Training and Exercise
Compliance (TEC) Capability:
Standard Operating Procedure**





Introduction

Exercises allow personnel from facility operators to spill response contractors to senior regulatory officials to validate the efficacy of any Owner/Operator's (O/O) Oil Spill Response Plan (OSRP), required under 30 CFR §254. Additionally, exercises allow for training and practice of strategic and tactical preparedness, protection, response, and recovery capabilities in a risk-reduced environment. Exercises are the primary tool for assessing preparedness and identifying areas for improvement, while demonstrating the regulated communities' resolve to prepare for their worst-case discharge (WCD) incidents. Further, both industry-initiated and/or Government-initiated unannounced exercises (GIUE) aim to help O/O's gain objective assessments of their capabilities so that gaps, deficiencies, and vulnerabilities are addressed prior to any real oil spill/discharge incident.

There are several layers of exercise-related regulatory requirements for offshore facilities under 30 CFR §254. These include, but are not limited to, the types of exercises required throughout a triennial exercise cycle, for example, the annual exercise to test an O/O's spill response management team (SRMT) and the requirement to exercise the entire OSRP at least once every 3 years. All of the individual exercise requirements interconnect to ensure that all aspects of planholders' preparedness efforts pay off during a real incident. Therefore, the importance of a robust, thorough, and coordinated offshore facility exercise and training compliance verification program cannot be overstated. The Training and Exercise Compliance (TEC) Capability component of the Oil Spill Preparedness Division (OSPD) Manual institutes four smaller regulatory programs based on the existing exercise and response personnel training regulatory requirements, and these have been grouped within four standard operating procedures (SOPs); see Table 2-1 below.

Within the paradigm of exercise-related regulatory requirements, there are two guidance documents that impact how OSPD will carry out its regulatory authority. Both the Homeland Security Exercise and Evaluation Program (HSEEP) and the National Preparedness for Response Exercise Program (NPREP) provide another layer of broad recommended activities associated with exercises. The TEC Capability SOPs seek to operationally blend all applicable sections of 30 CFR §254, HSEEP, and NPREP into a focused and coordinated offshore facility exercise and response personnel training compliance verification program. As exercises are the primary way to evaluate the operational effectiveness of an O/O's OSRP, the activities instituted by this capability will work cooperatively and concurrently with the OSRP Review and Enforcement SOPs.

Background

30 CFR §254 has 4 subparts (A, B, C, and D). Subparts A and B deal primarily with the development, approval, review, and revision of OSRPs. Subpart D manages the OSRP requirements for facilities located in State Waters seaward of the coastline. What remains within Subpart C, unlike the rest of 30 CFR §254, are several different categories of regulatory requirements. The table included in Appendix R breaks down individual aspects of Subpart C by providing a crosswalk from individual 30 CFR §254 cites and the applicable SOP within OSPD's Training and Exercise Capability.





As previously mentioned, there are several OSPD regulatory activities covered by this group of SOPs, which include stand-alone or direct TEC activities and concurrent or indirect TEC activities. Both are categorized under the TEC capability to include the following:

OSPD Regulatory Activities Covered by the TEC SOPs					
	Stand Alone/Direct		Concurrent/Indirect		
	TEC Regulatory Activities	30 CFR Cite		TEC Regulatory Activities	30 CFR Cite
Stand Alone/Direct	Verification of SRMT annual training on specific topics.	§254.41(b)(1-4)	Concurrent/Indirect	Periodic OSRO equipment inventory: Ensure sufficient spill removal equipment available to meet cumulative needs of O/Os who cite them in their plans.	§254.30(d)
	Qualified Individual (QI) is sufficiently trained to perform his/her duties.	§254.41 (c)		Verification that all records of services, personnel, and equipment can be provided by OSROs or cooperatives upon request.	§254.40
	Compliance verification for all training certificates and training attendance records for at least 2 years.	§254.41(d)		Compliance verification to ensure entire OSRP is exercised once every 3 years.	§254.42(a)
	Participation or evaluation of industry-led exercises.	§254.42(b)(1-4)		TEC-1: Industry-Led/Operator-Initiated Exercise Verification Program: Exercise Compliance Evaluation TEC-2: Unannounced/Government-Initiated Exercises Program: GIUE Administration TEC-3: International and Other Government Agency (OGA)-Initiated Exercise Involvement Program: External Exercise Involvement TEC-4: Spill Response Management Team Training Verification Program: Response Personnel Training Audit	
	Verification and approval of annual, semiannual, and triennial exercise compliance credits, when requested.	§254.42(d)(1-5) and §254.42(i)			
	Review and verification of all records related to spill response exercises within triennial exercise cycle.	§254.42(e)			
	Compliance verification with 30-day notice prior to any exercise required by §254.42(b)(1), (2), or (4).	§254.42(f)			
	Initiation and execution of Government Initiated Unannounced Exercises.	§254.42(g)			

Table 2-1. *OSPD's Exercise Compliance Regulatory Activities*

The stand-alone or direct regulatory activities are all covered within the TEC Capability Document. They have direct application to exercise compliance verification and, in some cases, can be done independently of any other regulatory activity. Concurrent or indirect regulatory activities are those that are not covered here, but may occur concurrently with the activities and regulatory compliance verification programs established within the TEC SOPs.

The SOPs contained within the TEC Capability document activities and tactics associated with the authorities found within the sections of 30 CFR §254 listed above. These individual regulatory authorities are further organized into the following four SOPs: Industry-led/operator-initiated exercise verification, unannounced/Government-initiated exercises, international and OGA-initiated exercise participation, and SRMT training verification. Each SOP has its own objective and establishes a separate regulatory activity program that corresponds with 30 CFR §254 cites. All of these SOPs and their programs are well-organized operational activities fully integrated with the guidelines and principles found within the HSEEP and NPREP process. Background information on both HSEEP and NPREP exercise development and execution regimes are discussed below, respectively.



HSEEP

HSEEP is a capabilities-based, objectives-driven exercise program that provides a standardized policy, methodology, and terminology for exercise design, development, conduct, evaluation, and improvement planning. HSEEP also provides tools and resources to facilitate the management of self-sustaining exercise programs. HSEEP methodologies are integrated wherever appropriate within this document, and should permeate all regulatory activities taken by OSPD with regard to exercise observation, participation, and evaluation.

OSPD personnel should recognize that HSEEP, in accordance with Homeland Security Presidential Directive 8 (HSPD-8) and the National Preparedness Goal, uses a progressive planning approach to individual exercises and exercise program management. This approach uses various exercises aligned to a common set of exercise program priorities and objectives with an increasing level of complexity over time. Consistent with a progressive approach, the GIUE program detailed within TEC-2 provides OSPD the flexibility to adjust the complexity of a spill scenario based on the applicable WCD. Further, OSPD could increase or decrease the complexity of any exercise based on the regulatory needs of individual exercise events.

The TEC capability is one of the five OSPD capabilities originally used to categorize the regulatory activities of OSPD. Therefore, in the spirit of the National Incident Management System (NIMS), HSEEP promulgates standardized policies and terminology usable by officials, emergency responders, and regulators at all levels of Government. Even though HSEEP is the accepted standardized policy and methodology for the execution of the National Exercise Program (NEP), for purposes of the TEC Capability it must also work alongside and in conjunction with the NPREP program. With the implementation of this document, OSPD will adopt HSEEP for all regulatory activities as set forth within the TEC Capability SOPs.

NPREP

NPREP was developed to establish a workable exercise program that meets the intent of section 4202(a) of the Oil Pollution Act of 1990 (OPA 90), amending section 311 (j) of the Federal Water Pollution Control Act (FWPCA), by adding new subsections for spill response preparedness [33 U.S.C. 1321 (j)]. NPREP was developed to provide a mechanism for compliance with the exercise requirements, while being economically feasible for the Government and oil industry to adopt and sustain. NPREP is a unified Federal effort and satisfies, if implemented properly, the exercise requirements of the U.S. Coast Guard (USCG), the Environmental Protection Agency (EPA), the Pipeline and Hazardous Materials Safety Administration (PHMSA), and the Bureau of Safety and Environmental Enforcement (BSEE). NPREP addresses the exercise requirements necessary for preparedness to an oil spill/discharge incident response. There are additional industry exercise and exercise-related training requirements contained in other Federal statutes and regulations that are not addressed within the NPREP guidelines specifically, but are addressed within the TEC Capability SOPs.

NPREP represents the minimum guidelines for ensuring adequate response preparedness. If personnel within the regulated community believe additional exercises or an expansion of the scope of the NPREP exercises are warranted to ensure enhanced preparedness, they are highly encouraged to conduct these exercises. NPREP exercises should be viewed as an opportunity



for continuous improvement of the response plans and the response system. Plan holders are responsible for addressing any issues that arise from evaluation of the exercises and for making necessary changes to the response plans to ensure the highest level of preparedness. Plan holders are required to meet the pollution response exercise requirements mandated by the Federal agency with regulatory oversight for the specific type of industry involved; e.g., vessels, marine transportation-related facilities, onshore and certain offshore non-transportation-related facilities, pipelines, and offshore facilities.

Regulatory Applicability

With respect to OSPD and offshore facilities, NPREP satisfies these requirements and can be used for exercise compliance under 30 CFR §254 Subpart C, as per 30 CFR §254.42(i). However, NPREP itself is a voluntary program and plan holders are not required to follow the NPREP guidelines. If plan holders choose not to follow NPREP guidelines, they may develop their own exercise program that complies with the regulatory exercise requirements. All plan holders, whether participating in the NPREP or following the exercise mandates of relevant agency regulations, will be subject to GIUEs mandated by OPA 90 and conducted by OSPD in accordance with 30 CFR §254.42(g). How OSPD selects, plans, initiates, executes, and reports out lessons learned with regard to these exercises are further described within the TEC-2 SOP.

For OSPD-regulated facilities, this document describes the processes by which the regulated community proves to OSPD that they have met 30 CFR §254 Subpart C requirements as well as how OSPD independently validates the efficacy of exercises and exercise-related training as required by 30 CFR §254. OSPD may also choose to do regulatory spot checks of any submitted exercise compliance documentation or independently and randomly spot check training and exercise-related records to verify the plan holders' compliance.

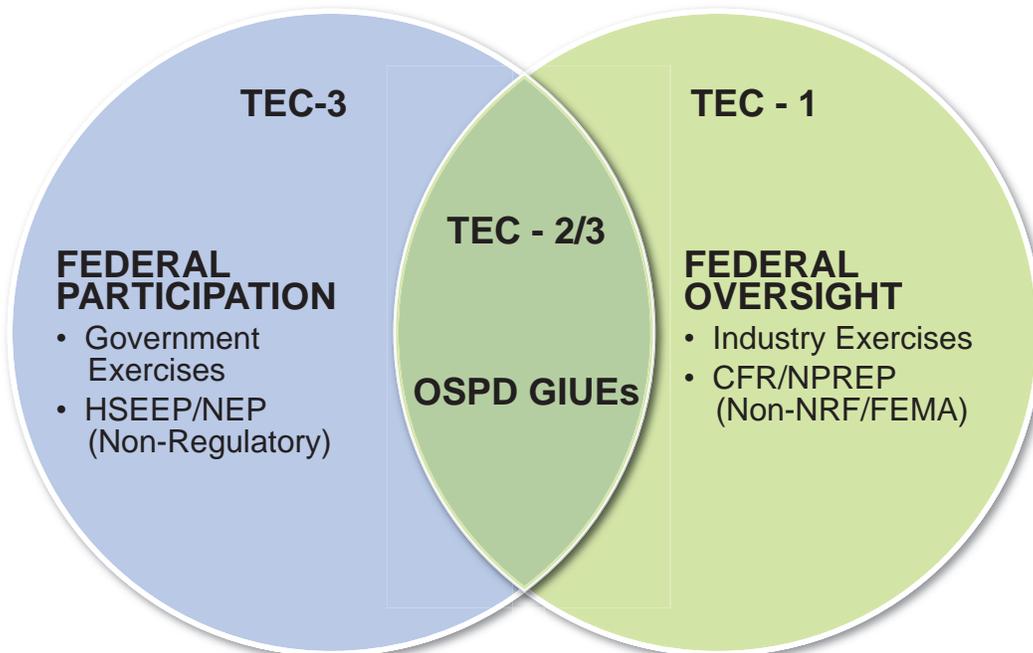


Figure 2-1: Exercise Programs With Federal Involvement.



Merged Exercise Programs

Refer to Figure 2-1, Exercise Programs With Federal Involvement, for a visual representation of the interactions, overlaps, and differences between HSEEP/NEP and NPREP exercise programs. For OSPD's purposes, the initiation and execution of GIUEs is where HSEEP/NEP and NPREP most overlap. OSPD will use HSEEP processes, modified as per the TEC-2 SOP, for all regulatory activities with regard to GIUEs. Also, under TEC-3, where international and OGAs may initiate exercises that OSPD has an interest in being involved with, presumably HSEEP will be utilized to the greatest extent possible by exercise design teams. No matter the type of exercise, who is the lead designer, or the organization methodology, OSPD personnel benefit from working within HSEEP and NPREP to complete their exercise compliance mission.

Similar to NPREP, there is no regulatory requirement for plan holders to conduct exercises in accordance with HSEEP principles. However, they are encouraged to do so as it is an excellent way to manage exercise development processes and would be consistent with GIUEs and other Government-initiated exercises that may involve industry. Based on the ways that HSEEP assists industry in developing exercises to meet regulatory compliance, FEMA has adopted it as the gold standard in exercise development and execution. HSEEP includes consistent terminology that can be used by all exercise planners, regardless of the nature and composition of their sponsoring agency or organization. HSEEP documents (available online) also provide tools to help exercise managers plan, conduct, and evaluate exercises to improve overall preparedness. HSEEP reflects lessons learned and best practices from existing exercise programs (such as NPREP) and can be adapted to the full spectrum of hazardous scenarios and incidents; e.g., natural disasters, terrorism, and technological disasters.

It is important to note that if an industry plan holder has developed one response plan that covers a fleet of vessels or regional operations of offshore platforms, this plan holder may utilize one exercise to meet multiple exercise requirements, with the exception of the QI notification exercises and the emergency procedures exercises, which are required for all manned vessels and unmanned barges, as per 33 CFR §155.101-5.

Summary

OSPD should remain aware that while exercise compliance can be achieved by following NPREP, it is not a requirement to use NPREP. The TEC Capability SOPs institutionalize that distinction by evaluating exercise compliance with actual regulatory citations, rather than NPREP guidelines. Simply put, the regulated community's exercise compliance can be met using NPREP or by utilizing their own program that complies with the primary regulatory exercise requirements; for offshore facilities that means compliance with exercise and response personnel training requirements of 30 CFR §254 Subpart C.

The TEC capability is one of the more difficult groupings of regulatory activities that OSPD must conduct. Preparedness compliance verification for OSPD's TEC capability is limited to ensuring exercise requirements are met and that the exercise-related training requirements are completed each year. For exercise compliance and GIUEs, HSEEP will function as the exercise development program within the context of the greater exercise compliance requirements (modified to best fit OSPD realities), whereas NPREP will remain as optional regulatory guidance provided by



various Federal regulators so that the regulated community continues to meet its triennial exercise requirements.

TEC-I: Industry-Led/Operator-Initiated Exercise Verification

Objective

This SOP establishes OSPD's Exercise Compliance Evaluation Program. These procedures detail how OSPD employees will verify compliance with the OSRP triennial exercise requirement for each plan holder specific to industry-led or operator-initiated oil spill preparedness exercises in accordance with 30 CFR §254.42(b) thru (f), (h), and (i). OSPD will also recognize and give credit for actual responses and/or exercises of which OSPD was not notified in accordance with 30 CFR §254.42(f) upon request and when supplied with all information necessary as per 30 CFR §254.42(d)(1-5).

OSPD Personnel Exercise Involvement and Restrictions

There are five ways OSPD personnel are involved with exercises, exercise planning, or regulatory oversight of exercises: observation (observer), design (planner), participation (player), control/evaluation (controller/evaluator) or regulatory compliance evaluation. Note that the regulatory compliance evaluation that may be conducted by OSPD is a distinct and separate function from all other exercise involvement (e.g., observer, planner, player, and controller/evaluator).

OSPD personnel may be tasked with any one of these five exercise related duties. OSPD personnel may also be asked to conduct more than one activity within any one-exercise evolution, however this should be avoided as much as possible. For example, OSPD design team members who also plan to evaluate an exercise or exercise component and, while that exercise is occurring, may be asked to participate or simulate OSPD reaction to a given scenario. In this case, the OSPD evaluator should

not participate or simulate OSPD reaction. Exercise evaluators should provide limited reaction to the scenario and make it clear to the exercise team which role they are filling. Additionally, if OSPD is on-site conducting a regulatory compliance evaluation they shall make every attempt to refer the exercise team to OSPD personnel not already conducting an official evaluation of the ongoing exercise or already involved in the exercise itself. Note that these exercise involvement restrictions are specific to industry-led and operator-initiated exercises and do not apply to GIUEs.

Observation

OSPD personnel shall limit exercise observation to the greatest extent possible. Observation, simply for the purpose of observing, provides little or no real value to OSPD as a whole. In a practical sense, observation by OSPD employees will usually be limited to the OSPD Headquarters staff as part of an international exercise or interaction with other officials while an exercise takes place.





Exercise Design Team and Exercise Participation

Participation as an exercise design team member or planner must be preapproved by the OSPD Section Supervisor/Branch Chief so that appropriate staff and scheduling decisions can be made. OSPD personnel that are part of the design team may end up participating in the exercise as an exercise evaluator and provide feedback based on exercise evaluation guides (EEGs). EEGs evaluate the exercise or exercise components and are not part of OSPD's regulatory exercise compliance evaluation process described later in this section. OSPD personnel involved in exercise design generally do not participate in the actual exercise and are recommended to provide exercise or exercise component related evaluation assistance as necessary. It is also recommended that OSPD personnel involved in exercise design not conduct regulatory exercise compliance evaluations.

OSPD exercise participants will be selected based on the job requirements and the inherent expertise of the regulators and staff employed by OSPD. Table 2-2 lists the specific roles within NIMS/Incident Command System (ICS) that OSPD may participate in during any type of exercise. This list is not comprehensive and the OSPD Section Supervisor/Branch Chief must preapprove any participation role so that appropriate staff and scheduling decisions can be made. Also, the OSPD Chief must further approve participation in exercises by OSPD personnel in roles not listed here so as to ensure nationally consistent roles in NIMS/ICS command structures within exercises.

Plan holders should be encouraged to request OSPD participation via official correspondence at least 30 days prior to the initial exercise planning meeting or exercise date. Other Government exercises or international exercises should involve OSPD personnel as soon as possible in the planning process to ensure appropriate participation by OSPD personnel.

If an official request comes into OSPD requesting OSPD participation, a response should be sent within 5 days of receipt of the request. OSPD should work to participate in those exercises that have a direct impact on the regulated offshore community, and make appropriate decisions regarding commitment of OSPD personnel to exercises that can positively benefit OSPD, BSEE, regulatory partners/stakeholders and the regulated community. Decisions to decline OSPD participation must be cleared with the appropriate OSPD supervisor and briefed to the OSPD Chief.



ICS/NIMS Roles For OSPD Personnel During Oil Spill Incident Exercises

ICS/NIMS Role and Description	Staffed by	CG-IMH Ref. Ver: 8/2006	CG-IMH Ref. Ver:
Agency Representative (AREP): An AREP is assigned to the incident with delegated authority to make decisions on matters affecting that agency's participation in the incident. AREPs report to the Liaison Officer (LNO) or to the Incident Commander (IC) in absence of a LNO. OSPD personnel will provide assistance as a general subject matter expert (SME) for OSRPs, BSEE Field Offices and Regions, issues related to source control and other duties as assigned or as necessary.	OSPD (except Response Research Branch (RRB))	Page: 6-5 & 6-6	
Technical Specialist (THSP): THSPs have specialized knowledge or expertise and may function within the Planning Section or be assigned wherever their services are required. OSPD personnel may be assigned as OSRP specialists, equipment and capability specialists, or other technical specialists wherever OSPD specific expertise is required and/or as assigned.	OSPD & RRB	Page: 8-12 & 8-13	
Environmental Specialist (ENSP): Research and Development Specialist that may be assigned to conduct Alternative Technology (ART) Evaluations and/or other tasks as required or assigned.	RRB Only	Page: 8-12 & 8-13	

Table 2-2. Specific NIMS/ICS Roles for OSPD Personnel.

Regulatory Compliance Evaluation

This is the primary method of involvement for OSPD personnel as it relates to exercise and exercise-related training regulated by 30 CFR §254. OSPD evaluation of individual plan holder's exercises and response personnel training is to determine whether or not the plan holder is meeting all regulatory requirements specific to the compliance activity being evaluated. With this in mind, the OSPD exercise and response personnel training evaluation process is form-based, consistent, and integrated with other OSPD SOPs in order to provide non-subjective compliance verification with the requirements of 30 CFR §254.42.

Specific parameters exist for OSPD personnel's evaluation of industry exercises and response personnel training and for giving feedback to the plan holder. While exercise observations may be reported to the plan holder, they must be tied to specific aspects of regulatory requirements. Anything communicated from OSPD personnel to anyone working within the regulated community may be construed as regulatory requirements or agency policy.

The evaluation process presented within this document relies on two triggers for OSPD evaluation regulatory activities—industry-provided 30-day notice before holding any exercise listed within 30 CFR §254.42(b), except notification exercises per 30 CFR §254.42(b)(3), and OSPD-initiated evaluations. OSPD-initiated regulatory compliance evaluations can happen anytime, regardless of whether industry provided proper 30-day notice. OSPD should rely on integrated regulatory activities, standard industry oversight, and random spot-checks in order to ensure maximum exercise and response personnel training compliance. This will allow OSPD multiple opportunities to evaluate how well prepared owners and operators of offshore facilities are to respond to their WCD to the maximum extent practicable. Accordingly, OSPD Sections should conduct evaluations on as many exercises as staffing levels allow.



Exercise Noncompliance

While there are specific guidelines for ensuring that all 30-day prior notifications are followed up, the question of those plan holders, facilities, or O/Os that either do not provide 30-day prior notifications or do not conduct required exercises or response personnel training as required will be addressed by ensuring that the entire OSPD Manual is fully utilized across all OSPD Sections. This is important in that the SOPs provide a connection across all the different OSPD regulatory activities and functions.

For instance, the TEC SOPs will feed exercise compliance information back to the applicable OSRP, and each OSRP can be tracked to ensure exercise compliance is happening every year by conducting a simple OSRP docket audit. Once this is fully implemented, it will become obvious when industry does not inform OSPD of planned exercises or does not conduct the required exercises. For example, an exercise compliance audit for the previous calendar year may be initiated in January or February. This audit would review OSRP training and exercise records and ensure they met their annual and/or semi-annual exercise requirements.

The OSPD evaluation program laid out under the TEC Capability SOPs is a simplified and manageable way for OSPD to ensure that plan holders are held accountable for their exercise requirements, that SRMTs and QIs are trained appropriately, and that every part of an OSRP is exercised at least once in a three-year period in accordance with the requirements under 30 CFR §254 Subpart C. Any other OSPD regulatory activity that requires evaluation not listed here is covered by another capability within the OSPD Manual.





TEC-1 Flowchart
(Industry Led/Operator Initiated Exercise Verification)

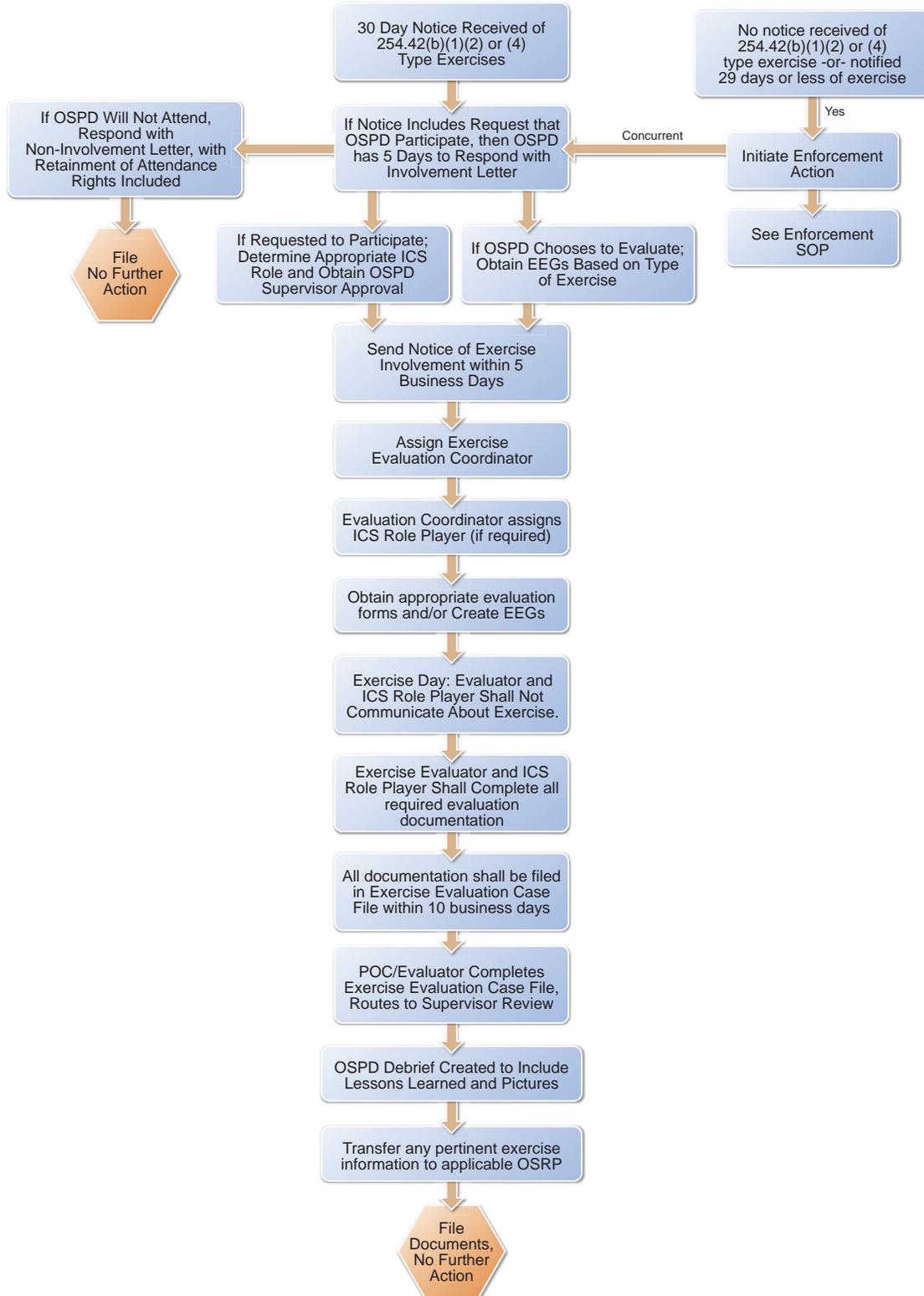


Figure 2-2. Industry-Led Exercises: Notification and Involvement Planning Timeline.



TEC-1: Industry-Led/Operator-Initiated Exercise Verification

Phase	Activity	Associated Materials	Timeline and Notes		
Exercise Compliance Program	Identify exercise evaluators	TEC capability SOPs, forms, and organizational chart	New Personnel: 6 months on-the-job training (OJT) prior to independent regulatory actions.		
	Train exercise evaluators				
Notification Activities	30-Day Notification Received	OSPD determines response:			
		If OSPD participation requested and the decision is no, document reason, deliver decline message			
		If OSPD participation requested and the decision is yes, describe involvement, staffing			
	Exercise Discovered, No Notice Received	OSPD personnel investigate discovery:		Enforcement action initiated when no notice exercise is corroborated, but not issued prior to exercise date.	
		Corroborate exercise type and date			
		Ensure no notification received by BSEE			
	Initiate enforcement action, then proceed as if 30-day notice received (see above)		Letter to the file		
	OSPD Notice of Involvement	Draft response for supervisor review	Determine if SRMT training would occur	Response must be sent within 5 working days.	
		Must contain reason for declination	Determine ability for OSPD to audit training		
		Must contain OSPD level of involvement	If potential exists for audit, add to response		
OSPD Involvement	Observation	Document need for observers or VIP tours	ICS 214 Review guidance for OSPD observers	3 weeks prior to exercise	
		Request approval from OSPD Chief		3 weeks prior to exercise	
		Finalize number of VIPs or observers		2 week prior to exercise	
		Coordinate onsite escort		One day prior/day of exercise	
	Design Team or In-Exercise Participation	Determine: Design Team Effort Level and NIMS/ICS role for OSPD		ICS 214 Any other documentation requested by exercise controllers	3 weeks or more prior to exercise
		Assign OSPD personnel based on appropriateness			2 weeks or more prior to exercise
		Conduct pre-exercise brief			1 week prior to exercise
		Conduct exercise			Day of exercise
	Regulatory Compliance Evaluation	Assign lead evaluator (senior personnel)		ICS 214 EEGs Triennial Exercise Worksheet Notice of Evaluation Form	3 weeks prior to exercise
		Develop evaluation material package/file			2 week prior to exercise
		Conduct pre-exercise brief with OSPD team			1 week prior to exercise
		Audit exercise			Day of exercise



TEC-1: Industry-Led/Operator-Initiated Exercise Verification

TEC-1: Industry-Led/Operator-Initiated Exercise Verification				
Phase	Activity	Associated Materials	Timeline and Notes	
Postevaluation Activities	File Documentation	Compile all exercise-related paperwork	Immediately after exercise	
		Complete all exercise-related paperwork		
		Ensure applicable OSRP file is updated		
		Complete enforcement actions		
	Exercise Credit Assessment	Receive industry request for exercise credit for actual spill response and/or exercise of which OSPD was not notified in accordance with 30 CFR 254.42(f)	Industry request letter and supporting documentation 30 CFR §254.42(d) Exercise compliance credit letter	Within 10 days of receiving exercise credit letter
		Review information provided, evaluate with §254.42(d)		
		Draft response letter for supervisor's signature		
		Include reasons and corrective action(s) for declination of credit		
	Exercise Compliance Assessment Brief	Collect exercise files	Exercise compliance, applicable OSRP and enforcement files	Once every quarter or month depending on exercise evaluation frequency
		Provide briefing to OSPD Section personnel		
		Discuss regulatory patterns, repetitive issues, recurring equipment malfunctions, and best practices for exercise evaluation		

Table 2-3. Industry Led/Operator-Initiated Exercise Compliance Activities.

TEC-2: Unannounced/Government-Initiated Exercise

Objective

This SOP establishes OSPD's Government-Initiated Unannounced Exercise (GIUE) Administration Program. These procedures detail how OSPD employees will schedule, design, and implement GIUEs as well as verify compliance with the OSRP triennial exercise requirement for each plan holder following an unannounced oil spill preparedness exercise in accordance with 30 CFR §254.42(g). For facilities in State waters, coordination with the appropriate State agency is highly encouraged. If a State agency plans to conduct an oil spill response exercise on a facility in State waters, OSPD should coordinate with the State agency and participate in the exercise if possible in lieu of conducting a separate exercise.

GIUEs

In general, GIUEs are designed to give the agency with primary regulatory oversight over a particular industry the opportunity to evaluate, on a random basis, the response preparedness



of that industry within the legal boundaries set by regulation. For OSPD, that means planning, initiating, and evaluating the offshore regulated community’s response to a GIUE as part of its organic regulatory activities.

In terms of the impact to the regulated community, every attempt is made to make this regulatory requirement as fair and reasonable as possible. For OSPD-regulated offshore facilities, the total number of GIUEs is determined by the OSPD Chief and may exceed 50 per year nationally. An individual O/O will not be required to participate in an OSPD unannounced exercise more than once per year, unless the results of previous exercises indicate that follow-up GIUEs are warranted due to poor performance during an exercise. A plan holder directed to participate in a GIUE is required to participate unless specific conditions exist that may result in safety hazards. The cost of the GIUE will be borne by the response plan holder.

For complex facilities that are regulated by two or more agencies, it is the responsibility of the exercising agency to notify and invite the participation of the other agency and the responsible On-Scene Coordinator in advance, so as to minimize the possibility of the facility undergoing exercises multiple times during a compressed time period. A plan holder that has successfully completed a GIUE for a particular facility generally will not be required to participate in another Federal GIUE for that facility for at least 36 months from the time of the last exercise provided that the exercise protocols and method of evaluation are equivalent. For unsuccessful GIUEs, the O/O may be required to participate in another GIUE, revise their OSRP to reflect lessons learned in the exercise, and/or implement an improvement plan. The plan holder must always maintain documentation of this participation and provide that documentation on request.

GIUE Facility Selection Criteria	Facility has never had to engage in a GIUE
	Facility has not had a GIUE in over 3 years
	Facility has seen an increase in spills
	Facility has a recent history (within 3 years) of 30 CFR §254 compliance issues
	Facility has a recent history (within 3 years) of other regulatory compliance issues*
	Facility had a significant change to its approved OSRP
	Facility’s oil spill removal organization (OSRO) has a capability or management change
	Facility has unknown consistency with Area Contingency Plan (ACP), Geographical Response Plan (GRP), or Regional Contingency Plan (RCP)
	OSPD is directed to initiate a GIUE on the facility
	Facility is conducting a source control exercise

Table 2-4. *GIUE Selection Criteria.*

*Other regulatory compliance issues mean that any documented violation of any other state or federal regulations related to a specific facility may be utilized to justify a GIUE on that facility.



Figure 2-3 and Tables 5-5a thru 5-5c below describe in detail how the modified HSEEP process will work for OSPD GIUE coordinators. This is the process for planning their GIUE only; OSPD evaluators should utilize TEC-1 for procedures on regulatory exercise compliance evaluation. Modifications to HSEEP include the development of the 30-30-30 planning cycle that better reflects the nature of OSPD GIUE administration.

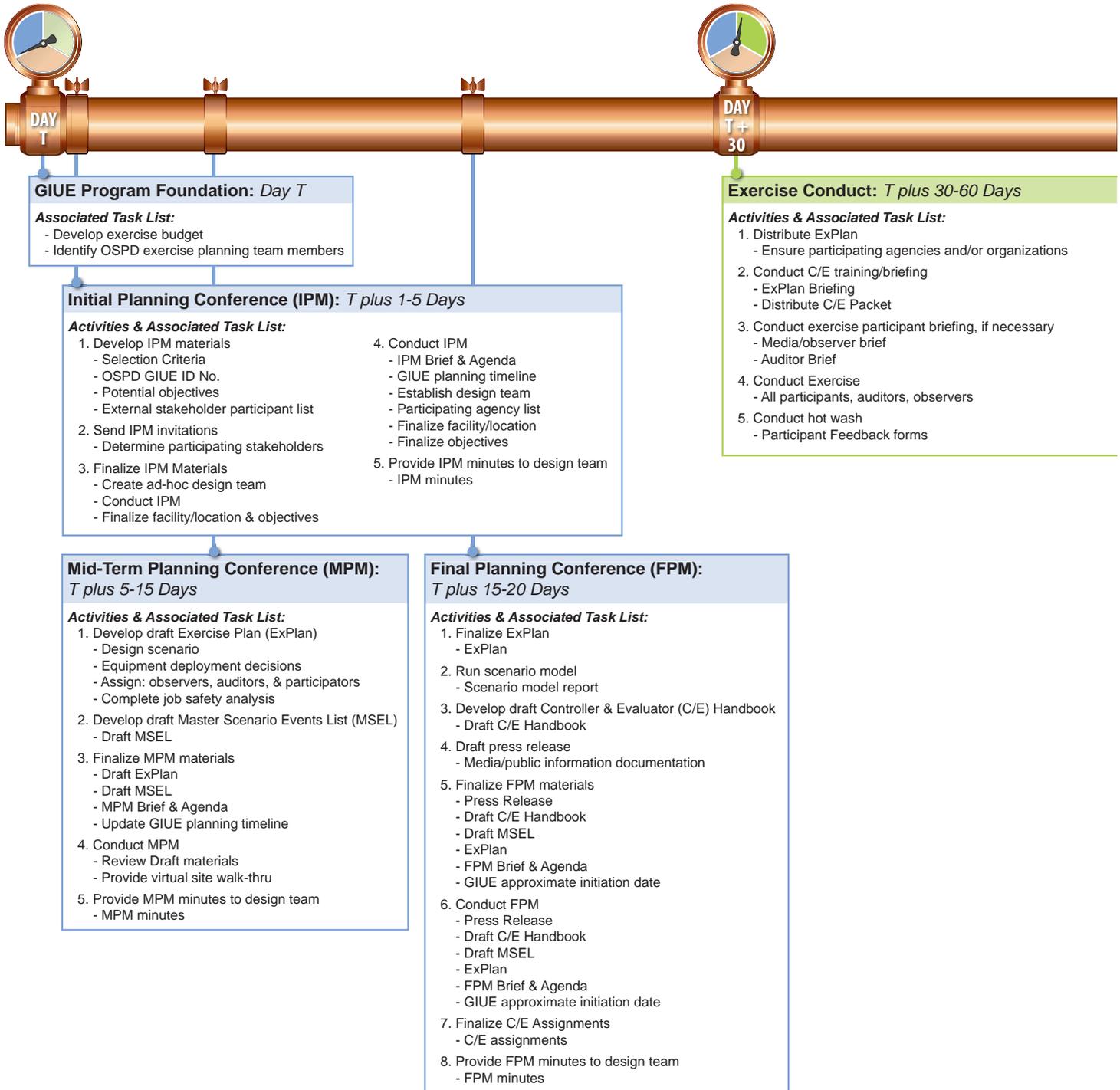


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OIL SPILL PREPAREDNESS DIVISION'S 30-30-30 CYCLE: A guide to Offshore GIUEs

30 days to plan, 30 days to execute, 30 days to complete final report



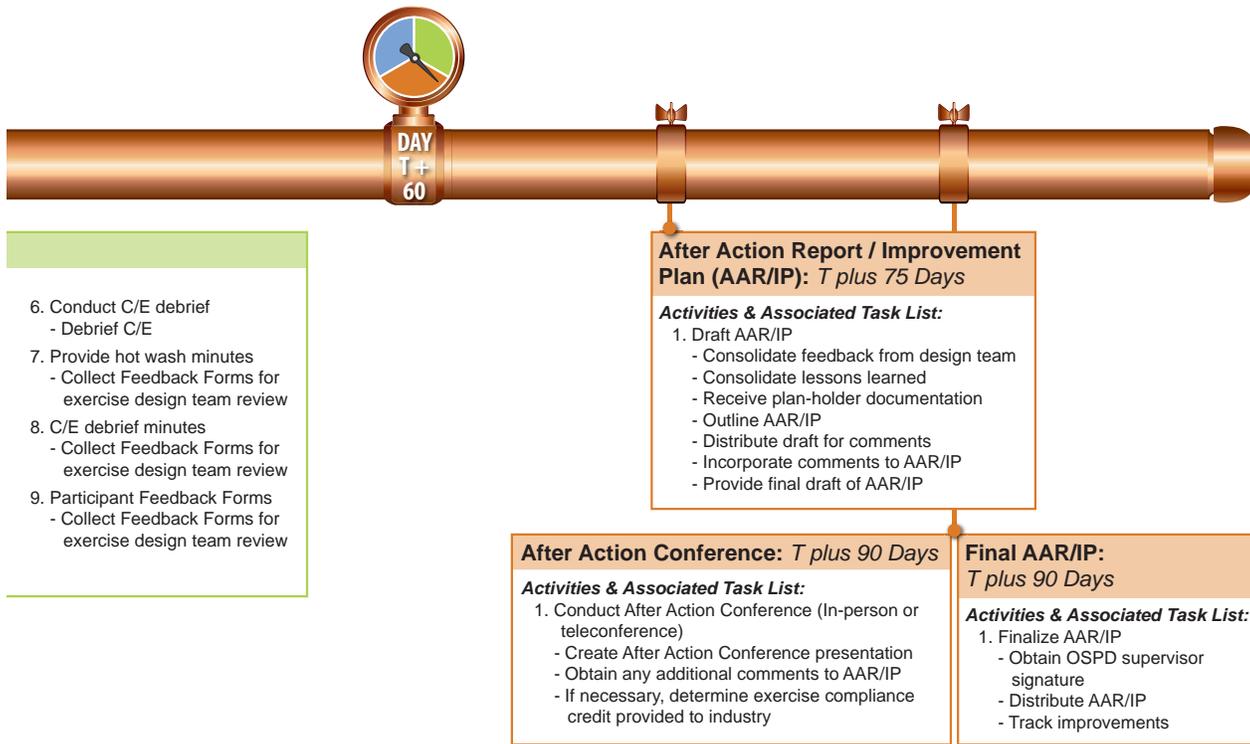


Figure 2-3: Timeline Graphic for HSEEP Compliant GIUE.



TEC-2: Unannounced/Government-Initiated Exercise

Phase	Activity	Task List	Associated Materials	Timeline and Notes
GIUE Program Foundation		Develop exercise budget	30-30-30 GIUE Planning Cycle	Day "T" = first workday of 30-30-30 planning cycle
		Identify OSPD exercise planning team members		
Initial Planning Meeting (IPM) 1 <small>Note: Informally held via teleconference or other collaborative Internet service.</small>	Develop IPM materials	Selection criteria	TEC Capability SOPs, HSEEP forms, and organizational chart	Within T + 2 Days
		OSPD GIUE ID No.		
		Potential objectives		
		External stakeholder participant list		
	Send IPM invitations	Determine participating stakeholders	Draft email to external stakeholders	No later than T + 2 Days
	Finalize IPM materials	Create ad hoc design team	GIUE file, applicable OSRP file, facility map, charts, pictures, etc.	Within T + 4 Days
		Conduct IPM		
		Finalize facility/location and objectives		
	Conduct IPM	IPM brief and agenda	TEC Capability SOPs, HSEEP forms, GIUE file	No later than T + 5 Days
		GIUE planning timeline		
Establish design team				
Participating agency list				
Finalize facility/location				
Provide IPM minutes to design team	Finalize objectives	Send email to external stakeholders	Immediately after IPM	
Mid-Term Planning Meeting (MPM)	Develop draft Exercise Plan (ExPlan)	Design scenario	HSEEP example documents, OSPD staffing schedule, ICS safety forms	Within T + 10 Days
		Equipment deployment decisions		
		Assign observers, auditors, and participators		
		Complete job safety analysis		
	Develop draft Master Scenario Events List (MSEL)	Draft MSEL	HSEEP example MSELs	Within T + 10 Days
	Finalize MPM materials	Draft ExPlan	GIUE file	Within T + 15 Days
		Draft MSEL		
		MPM brief and agenda		
		Update GIUE planning timeline		
	Conduct MPM	Review draft materials	Interim draft documents provided for review to include virtual tour of facility via maps, charts, pictures, etc.	No later than T + 15 Days
Provide virtual site walk-through				
Provide MPM minutes to design team	MPM minutes	Send email to external stakeholders	Immediately after MPM	



TEC-2: Unannounced/Government-Initiated Exercise

Phase	Activity	Task List	Associated Materials	Timeline and Notes	
Final Planning Meeting (FPM)	Finalize ExPlan	ExPlan	Final draft ExPlan	Within T + 20 Days	
	Run scenario model	Scenario model report	Oil spill modeling software	Within T + 20 Days	
	Develop draft Controller and Evaluator (C/E) Handbook	Draft C/E Handbook	HSEEP example documents	Within T + 20 Days	
	Draft press release	Media/public information documentation	Example press release	Within T + 20 Days	
	Finalize FPM materials	Press Release	GIUE file	GIUE file	Within T + 20 Days
		Draft C/E Handbook			
		Draft MSEL			
		ExPlan			
		FPM brief and agenda			
		GIUE approximate initiation date			
	Conduct FPM	Press release	Final draft documents for administrative record	Final draft documents for administrative record	No later than T + 20 Days
		Draft C/E Handbook			
		Draft MSEL			
ExPlan					
FPM brief and agenda					
GIUE approximate initiation date					
Finalize C/E assignments	C/E assignments	Draft C/E Handbook	Prior to conclusion of FPM		
Provide FPM minutes to design team	FPM minutes	Send email to external stakeholders	Immediately after FPM		

Note 1: Minor GIUEs, those expected to last less than 6 hours, may merge the IPM and MPM together into one meeting within the T + 20 days timeframe. Major GIUEs, those expected to last between 6–12 hours, must adhere to the provided timeline.

Table 2-5a. Operations-Based Exercise Planning Timeline (30-30-30 Cycle Part I).



TEC-2: Unannounced/Government-Initiated Exercise

Phase	Activity	Task List	Associated Materials	Timeline and Notes
Exercise Conduct	Distribute ExPlan	Ensure participating agencies and/or organizations	GIUE file and ExPlan	Within T + 35 Days
	Conduct C/E training/ briefing	ExPlan briefing	C/E Handbook, MSEL, communications plan, C/E assignments	Minimum 1 day before exercise
		Distribute C/E Handbook		
	Conduct exercise participant briefing, if necessary	Media/observer brief		Just prior to start of exercise
		Auditor brief		
	Conduct exercise***	All participants, auditors, observers	GIUE file: All exercise documents	Day of exercise
	Conduct hot wash	Participant feedback forms		Within 2 hours after exercise
	Conduct C/E debrief	Debrief C/E	C/E Debrief presentation	Within 1 day after exercise
	Provide hot wash minutes	Collect feedback forms for exercise design team review	Hot wash minutes	Within 1 day after exercise
	C/E debrief minutes		C/E debrief minutes	
Participant Feedback Forms	Participant feedback forms			

Note 2: The GIUE may be initiated on any day within the 30–60 day time period from Day T (T + 30–60 days).

Note 3: While there is no prescribed method of picking GIUE initiation days, it is recommended that they be randomly selected within the 30 days of the second month of the 30-30-30 cycle.

Table 2-5b. Operations-Based Exercise Planning Timeline (30-30-30 Cycle Part II).



TEC-2: Unannounced/Government-Initiated Exercise

Phase	Activity	Task List	Associated Materials	Timelines and Notes
After-Action Report/ Improvement Plan (AAR/IP)	Draft AAR/IP	Consolidate feedback from design team	Draft AAR/IP GIUE file: All exercise-related documents from all involved parties	Within T + 75 Days
		Consolidate lessons learned		
		Receive plan holder documentation		
		Outline AAR/IP		
		Distribute draft for comments		
		Incorporate comments to AAR/IP		
		Provide final draft of AAR/IP		
After-Action Meeting	Conduct After-Action Meeting (In-person or tele-conference)	Create After-Action Meeting presentation	Interim Draft AAR/IP GIUE file: All exercise-related documents from all involved parties	Within T + 90 Days
		Obtain any additional comments to AAR/IP		
		If necessary, determine exercise compliance credit provided to industry		
Final AAR/IP	Finalize AAR/IP	Obtain OSPD supervisor signature	Final AAR/IP GIUE file: All exercise-related documents from all involved parties	Within T + 90 Days
		Distribute AAR/IP		
		Track improvements		

Note 4: The GIUE coordinator has until the end of the next month to complete post GIUE activities. For example, if the GIUE was initiated on the 18th day of the second month of the cycle (Day T plus 48) the GIUE point of contact has the rest of the month (12 days approx.) and the entire 30 days of the last month of the cycle for a total of 42 days after the GIUE was initiated to complete all post exercise administrative record tasks.

Table 2-5c. Operations-Based Exercise Planning TimeLine (30-30-30 Cycle Part III).





TEC-3: International and OGA-Initiated Exercise Participation

Objective

This SOP establishes the External Exercise Involvement Protocols. These protocols detail how OSPD employees will work with international organizations and OGAs on oil spill preparedness exercises and verify compliance with the OSRP triennial exercise requirement for any plan holder that may have participated in the oil spill preparedness exercise in accordance with 30 CFR §254.42.

Factors, in order of importance, to be used when determining whether OSPD personnel should be involved in international or other Government agency exercises:

1. Were you requested to participate by the OSPD Chief or other BSEE or U.S. Department of the Interior senior management?
2. Would OSPD have any jurisdiction, authority, or expertise with regard to the exercise scenario and/or players?
3. If the answer to #2 was yes, would the exercise provide potential positive benefits by providing an opportunity for OSPD and its plan holders to interact in a consequence-free incident response environment?
4. Would OSPD personnel benefit from the experience of whatever involvement is proposed?
5. What is the current OSPD workload for the personnel potentially involved and how will it affect OSPD work products and projects?
6. What are the potential consequences for not being involved in the proposed exercise?
7. If necessary, respond to exercise planners with a counter proposal for OSPD involvement that better reflects the current operational needs of OSPD.

Once all of the above questions are answered, OSPD personnel should approach the appropriate OSPD supervisor with an involvement recommendation. This should then be briefed up to the OSPD Chief for final decision-making on recommended course of action. Table 2-6 below provides OSPD personnel with general guidance once a decision has been made regarding OSPD involvement.



TEC-3: International and Other Government Agency-Initiated Exercises			
OSPD Involvement	Involvement Type	Additional guidance	Potential time requirements
	Observation	Review definition of observer	Based on length of actual exercise
		Document exercise via ICS 214	
	Evaluation	Review HSEEP materials for exercise evaluation and control	<i>Medium to minimal:</i> Should be relegated to design team member if possible. If OSPD evaluation occurs, must only be related to 30 CFR §254, not other regulatory programs unless agreed to prior to exercise.
		Review provided EEGs	
		Ensure evaluation is related directly to exercise or OSPD-related regulatory issues	
	Participation	Review exercise plan	<i>Medium:</i> Based on level of participation, role within exercise, etc. Participants must fulfill exercise requirements.
		Ensure OSPD staffing is adequate during exercise so participants can fully engage	
	Design Team	Review HSEEP materials for exercise planning	<i>Maximum:</i> Significant time required. Design team membership requires 100 percent commitment to all aspects of exercise planning.
		Record all activities within ICS 214	
If relevant, draft internal lessons learned document			
Determine/manage additional OSPD personnel involvement			
Other involvement with Supervisor's approval	OSPD may be asked to be involved in other parts of exercise planning, development or conduct. OSPD should be prepared to provide reasonable commitment to international agencies and other governments.	<i>Determined on a case-by-case basis.</i>	

Table 2-6. Potential Time Requirements for Int'l and Other Government Agency Exercises.



TEC-4: Response Personnel Training Audit Program

Objective

This SOP establishes the Response Personnel Training Audit (RPTA) Program. These procedures detail how OSPD employees will conduct SRMT and QI annual training compliance reviews in accordance with 30 CFR §254.41(b)(1-4), (c) and (d).

RPTA Regulatory Activity Modes

OSPD employees will conduct SRMT and QI annual training compliance reviews in accordance with 30 CFR §254.41(b)(1-4), (c), and (d) whenever practicable. For purposes of providing a clear distinction between this regulatory compliance verification authority and all others, from this point forward, all work done under TEC-4 will be referred to as RPTA procedures. RPTA authority can be exercised via the following three regulatory activity modes:

1. Attend the training. During a planned exercise, the plan holder often schedules required annual training in association or conjunction with their planned exercise. OSPD personnel should already know about the exercise due to the 30-day notification requirement. Further, there is nothing preventing OSPD from inquiring if there is any exercise-related training to be scheduled before or after the exercise itself. It is recommended that this question be asked of plan holders any time notification is received. OSPD personnel have the option of physically sitting in on the training to ensure that the required topics are covered utilizing the RPTA process.

When utilizing RPTA authority in this manner, OSPD personnel must announce their presence at the training event and clearly state their name, organization, title, and purpose for being at the training. The efficacy of the instructor, the quality of the training material, and/or the functionality of the training room shall not be evaluated. Lastly, remember that OSPD can only conduct enforcement on exercises that are not reported to OSPD 30-days prior, and not response personnel training.

2. Review the training records onsite during an operator-led exercise. The same scenario as #1, only OSPD personnel could not physically attend and audit the training event. In this scenario, at an appropriate time that does not distract the plan holder from important exercise-related duties, OSPD would conduct a review of the training records utilizing the RPTA procedures. This regulatory activity is done onsite if the training and exercise are co-located. If they are not co-located, additional coordination efforts will be necessary.
3. Review the training records independently. This regulatory activity may be done offsite or onsite, if the training and exercise records are co-located.



RPTA Compliance Verification Thresholds

RPTA procedures are simple steps that utilize forms to complete regulatory compliance verification of a plan holder's SRMT, spill response coordinator, and alternates' training frequency and content. It also provides the plan holder with instantaneous feedback on compliance status. An evaluation of the SRMT, including the spill response coordinator and alternates' annual training involves ensuring that the following topics were covered:

1. Locations, intended use, deployment strategies, and the operational and logistical requirements of response equipment
2. Spill reporting procedures
3. Oil spill trajectory analysis and predicting spill movement
4. Any other responsibilities the SRMT may have

Concurrently to the SRMT, an audit of the training for the QI must determine if he or she is sufficiently trained to perform their duties.

RPTA Frequently Asked Questions

Question: How does OSPD verify plan holder compliance with SRMT training requirements under 30 CFR §254.41(b)(1-4), (c), and (d)?

Answer: OSPD utilizes the RPTA program as detailed below.

Question: Does the RPTA procedures apply to verification of spill response operating team (SROT) training requirements under 30 CFR §254.41(a)?

Answer: Yes. You can use RPTA procedures and the form to verify training compliance for SRMT, SROT, spill response coordinator and alternates, and QIs. SROT verification actions are technically part of the EVC-2 SOP however; SROT verification actions are functionally tied to RPTA procedures.

Question: What qualifies as annually?

Answer: For purposes of RPTA regulatory activities, 1 year is defined as training that must occur within each calendar year. Note that training that occurs January 2012 and then again in November 2013 qualifies as annual training under RPTA guidelines.

Question: Suppose that an initial OSRP is approved in early November. Does the plan holder have to complete all their response personnel training within that same calendar year, regardless of the limited remaining time to complete the annual requirements?

Answer: No. Response personnel are required to receive training before the initial OSRP can be approved, therefore the next annual training period should be considered to start the following calendar year, as long as the previous training occurred within 12 months of the date the initial OSRP was approved. The date of the previous training should be included in the Initial OSRP.



Question: When is a QI sufficiently trained to perform his or her duties?

Answer: For the QI threshold of determining sufficiently trained, OSPD must subjectively determine, based upon documentation provided, whether it is more likely than not that the training occurred and that the training received is sufficient for the QI to perform his or her duties.

Question: What constitutes proof of compliance with regard to “covered” instruction topics?

Answer: Proof of compliance is subjective in that there is no set definition of what constitutes proof or what constitutes sufficient proof. OSPD personnel have the ability to discern, using their own best judgment, whether or not training took place, whether the training content met regulatory specifications, and whether or not all the necessary people were trained. Below are some RPTA scenarios that provide examples of what constitutes sufficient proof that, more likely than not, the plan holder is in compliance with 30 CFR §254.41(b)(1-4), (c), and (d).

RPTA Example 1: Immediately following a minor GIUE, OSPD conducts an RPTA. The plan holder provides the following documentation:

1. Sign-in sheet dated 11/15/12 with every SRMT member’s signature
2. A training agenda that indicates all required training topics were to be discussed
3. A student training booklet with presentations that suggest that all of the required training topics were covered

Given the above scenario, it would be prudent for the OSPD auditor to determine that it is more likely than not that the frequency of and training topics required for response personnel were adequately covered and that they have met the compliance requirements for 30 CFR §254.41(b) (1-4).

RPTA Example 2: Two days after a 15-barrel spill from an offshore facility, OSPD conducts an RPTA on the plan holder’s SRMT and QI. The plan holder provides the following documentation:

1. Sign-in sheet with no date on it and half of the names found within the OSRP
2. A sign-in sheet from 2 years ago with the other half of the names found within the OSRP
3. A certificate of completion from a recognized QI training course dated 3 months prior
4. A training agenda that indicates all required training topics were to be discussed

Given the above scenario, it would be prudent for the OSPD to question whether the full SRMT had been trained annually. The information provided by the plan holder does not provide sufficient proof that, more likely than not, the required annual training took place. However, the QI has been sufficiently trained based on the recent certificate provided.



RPTA Modes	RPTA Compliance Thresholds for TEC-4 and EVC-2 SOPs				Documentation Types (not a complete list)
	Job Title	Training Frequency	Specific Requirements	Records Retention	
Attend exercise-related training Review exercise-related training Independent review	SRMT Spill Response Coordinator Alternates	Annually	Locations, intended use, deployment strategies, and the operational and logistical requirements of response equipment Spill reporting procedures Oil spill trajectory analysis and predicting spill movement Any other responsibilities the SRMT may have	All training certificates and training attendance records must be kept at the location designated in the OSRP for at least 2 years. They must be made available to any authorized BSEE representative upon request.	<i>All documents must be clearly labeled and dated:</i> Sign-in Sheets Agendas Training Materials Slide Presentations Course Curriculum Completion Certificates Training Certificates Third-party written confirmation Video or audio recordings Applicable/relevant OGA documents Any other directly relevant documentation
	QI	Not Specified	Must be sufficiently trained to perform QI duties		
	SROT	Annually	Attend hands-on training classes for deployment and operation of the spill response equipment that the SROT will use		
	SROT Supervisors		Directing response equipment deployment and operation		
Auditors should use their experience and best judgment when examining provided documentation and then determine whether it is more likely than not that a specific training event took place. Any compliance failure decisions must be fully documented prior to any recommended enforcement action.					

Table 2-7. RPTA Program Essentials.



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Section 3 - Equipment Preparedness Verification Capability (EVC)





Introduction

Following the creation of the Bureau of Safety and Environmental Enforcement (BSEE) in fall 2011, inspections authority for offshore oil facilities remained with the regional supervisor and field offices. However, the authority to verify the preparedness of oil spill response equipment listed in approved oil spill response plans (OSRPs) is delegated to BSEE's Oil Spill Preparedness Division (OSPD). OSPD manages the compliance process for monitoring the preparedness and readiness levels of oil spill response equipment owned or contracted by offshore facilities owners/operators (O/O). See Table 3-1 for related statutory and regulatory authorities.

The Equipment Preparedness Verification Capability (EVC) Standard Operating Procedures (SOPs) support the essential regulatory purpose of OSPD, which is to ensure that the Nation's offshore resource explorers and petroleum energy providers are ready to respond when a discharge of oil occurs from any of their offshore facilities. An O/O's ability to respond effectively to an offshore worst-case discharge oil spill to the maximum extent practicable is directly related to the preparedness status of the equipment listed within the O/O's OSRP.

Therefore, equipment listed within the plan should be verified on a periodic basis by OSPD personnel to ensure that it is being properly maintained, is ready to be operated, and performs as specified by the manufacturer. The EVC SOPs stipulate a new process called the "Equipment Preparedness Verification Meeting" that relies on a tiered approach to regulatory compliance regarding oil spill response equipment. See Table 3-2 within the EVC-1 SOP for details on the overall process and actions taken by OSPD personnel during an equipment preparedness verification meeting. The equipment preparedness verification meeting has several procedural tiers. Tiers I and II are stipulated within EVC-1. Tier III is actually a deployment exercise and therefore requires initiation of a TEC activity. OSPD personnel also have the option to initiate a Response Personnel Training Audit. Tier III activities are covered in the EVC-2 section and require OSPD personnel to refer to the TEC section of the OSPD Manual to complete those regulatory activities.

Regarding the need to verify the preparedness of response equipment listed within a plan holder's OSRP, OSPD personnel may be asked, on occasion, to approve equipment movement from one geographic area to another by OSROs. This kind of request must always be redirected to plan holders and their contracted OSROs. OSPD does not approve or disapprove any movement or cascading of resources from one geographic area to another. Instead, OSPD personnel shall remind any OSRO that requests this approval to check with their plan holders in order to determine if moving or cascading equipment would affect an O/O's capability to respond, to the maximum extent practicable, to a worst-case discharge or a substantial threat of such a discharge.





Applicable Statutory and Regulatory Citations: Offshore Facility Record Review and Inspection Authority	
Outer Continental Shelf Lands Act	<p>43 USC 1347(c) <i>The Secretary and the Secretary of the Department in which the Coast Guard is operating shall individually, or jointly if they so agree, promulgate regulations to provide for—</i></p> <p>(1) <i>scheduled onsite inspection, at least once a year, of each facility on the outer Continental Shelf which is subject to any environmental or safety regulation promulgated pursuant to this Act, which inspection shall include all safety equipment designed to prevent or ameliorate blowouts, fires, spillages, or other major accidents; and</i></p> <p>(2) <i>periodic onsite inspection without advance notice to the operator of such facility to assure compliance with such environmental or safety regulations.</i></p>
Clean Water Act	<p>33 USC 1320(j)(6) Equipment Requirements and Inspection. <i>Not later than 2 years after the date of enactment of this section, the President shall require—</i></p> <p>(A) <i>periodic inspection of containment booms, skimmers, vessels, and other major equipment used to remove discharges; and</i></p> <p>(B) <i>vessels operating on navigable waters and carrying oil or a hazardous substance in bulk as cargo to carry appropriate removal equipment that employs the best technology economically feasible and that is compatible with the safe operation of the vessel.</i></p> <p>(m)(2) For Facilities.</p> <p>(A) Recordkeeping. <i>Whenever required to carry out the purposes of this section, the Administrator or the Secretary of the Department in which the Coast Guard is operating shall require the owner or operator of a facility to which this section applies to establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment and methods, and provide such other information as the Administrator or Secretary, as the case may be, may require to carry out the objectives of this section.</i></p> <p>(B) Entry and Inspection. <i>Whenever required to carry out the purposes of this section, the Administrator or the Secretary of the Department in which the Coast Guard is operating or an authorized representative of the Administrator or Secretary, upon presentation of appropriate credentials, may—</i></p> <p style="padding-left: 20px;">(i) <i>enter and inspect any facility to which this section applies, including any facility at which any records are required to be maintained under subparagraph (A); and</i></p> <p style="padding-left: 20px;">(ii) <i>at reasonable times, have access to and copy any records, take samples, and inspect any monitoring equipment or methods required under subparagraph (A).</i></p>
30 CFR §254: Oil Spill Response Requirements for Facilities Located Seaward of the Coast Line	<p>§254.43 Maintenance and periodic inspection of response equipment.</p> <p>(a) <i>You must ensure that the response equipment listed in your response plan is inspected at least monthly and is maintained, as necessary, to ensure optimal performance.</i></p> <p>(b) <i>You must ensure that records of the inspections and the maintenance activities are kept for at least 2 years and are made available to any authorized BSEE representative upon request.</i></p> <p>§254.45 Verifying the capabilities of your response equipment.</p> <p>(a) <i>The Regional Supervisor may require performance testing of any spill-response equipment listed in your response plan to verify its capabilities if the equipment:</i></p> <p style="padding-left: 20px;">(1) <i>Has been modified;</i></p> <p style="padding-left: 20px;">(2) <i>Has been damaged and repaired; or</i></p> <p style="padding-left: 20px;">(3) <i>Has a claimed effective daily recovery capacity that is inconsistent with data otherwise available to BSEE.</i></p> <p>(b) <i>You must conduct any required performance testing of booms in accordance with BSEE approved test criteria. You may use the document “Test Protocol for the Evaluation of Oil-Spill Containment Booms,” available from BSEE, for guidance. Performance testing of skimmers also must be conducted in accordance with BSEE approved test criteria. You may use the document “Suggested Test Protocol for the Evaluation of Oil Spill Skimmers for the OCS,” available from BSEE, for guidance.</i></p> <p>(c) <i>You are responsible for any required testing of equipment performance and for the accuracy of the information submitted.</i></p>

Table 3-1. All related statutory and regulatory authorities for offshore facility records review and inspections of equipment.



Equipment Preparedness Verification Meeting

The equipment preparedness verification meeting process starts with a Tier I records review. Tier I records reviews allow OSPD personnel maximum flexibility in that personnel may choose to review records offline, or prior to meeting in person. This can assist OSPD personnel in focusing on certain equipment or records in order to maximize time when meeting in person. Procedures established for Tier I records reviews apply to both offline and in-person reviews. If discrepancies are noted in relation to regulations, and once on-site with the equipment in question, OSPD personnel may move on to a Tier II performance test. OSPD personnel should note that a Tier II performance test can only occur during the in-person equipment preparedness verification meeting. Finally, if none of these actions satisfy OSPD's ability to ensure that the equipment and their operators are fully prepared, a Tier III deployment exercise may be initiated. Tier III activities should be commenced in accordance with the Training and Exercise Compliance SOPs for evaluating an exercise (TEC-1) and conducting Government Initiated Unannounced Exercises (GIUEs) (TEC-2).

This approach to regulatory compliance allows maximum flexibility for OSPD personnel's limited time and resources. First, it allows for targeted preparedness verification utilizing established metrics to better focus OSPD resources. For instance, plan holders with no history of noncompliance or who have recently completed a fullscale exercise would not ordinarily be targeted for a preparedness verification meeting. Second, the Tier I records review may trigger a performance test, which ensures that equipment operators' record keeping is being evaluated along with equipment preparedness. Finally, it allows OSPD, via the preparedness verification meeting process, to confirm that oil spill response equipment is receiving appropriate maintenance to ensure it is ready to use when needed.

OSPD personnel should be clear to the OSRO and O/O representative that the tiered process for the equipment preparedness verification is not, in and of itself, an enforcement action. Further, Tier II and III actions within the equipment preparedness verification meeting are not negative conditions; they are simply regulatory methods for OSPD to verify the preparedness status of oil spill response equipment listed within certain approved OSRPs. The entire regulatory activity is conducted in accordance with 30 CFR §254 Subpart C requirements.

Regulatory Applicability

Table 3-1 provides a listing of the authorities delegated to the Department of the Interior (DOI) with regard to administrative recordkeeping and offshore facility entry and inspections. However, 30 CFR §254 narrows this authority dramatically as it relates to oil spill response equipment preparedness verification. This mirrors the general relationship between statutes and regulations, where a typical statute may establish an obligation or a mandate on behalf of a Federal agency. Then, in order to comply with that mandate, the agency will promulgate a regulation as to how the agency will enforce compliance with the statutory requirements.



Tier I Records Review

Tier I records review authority originates from 30 CFR §254.43(a) and (b). Whether offline or in person, OSPD personnel may request any applicable records, going back no more than 2 years for any response equipment listed within the OSRP. OSPD personnel shall continue to request records under 30 CFR §254.43(b) until the reviewer has determined compliance with 30 CFR §254.43(a). If the record(s) is in compliance, OSPD personnel should have no problem determining response equipment preparedness status. The compliance determination metric here comes from 30 CFR §254.43(a): “response equipment listed in your response plan is inspected at least monthly and is maintained, as necessary, to ensure optimal performance.” Until the regulated community is provided greater specificity as to what type of records are required to ensure compliance with 30 CFR §254.43(a), OSPD personnel shall not be prescriptive regarding the type of records received. That is to say, no matter the format and record type, if OSPD can make a compliance determination, it should do so with the records provided by the regulated community. OSPD should expect that the records provided by owners and/or operators, to fulfill OSPD requests, include the following information to verify compliance with 30 CFR §254.43(a):

1. Monthly inspection records that show each piece of equipment within the scope of OSPD’s inquiry was specifically inspected (e.g. visually) in a way that damage would be identified.
2. Preventative/Scheduled Maintenance Records that list all maintenance activities (repairs and/or modifications) that ensures optimal performance for each piece of equipment within the scope of OSPD’s inquiry.

Tier II Performance Testing

Tier II performance testing authority originates from 30 CFR §254.45(a)(1), (2) and (3). OSPD personnel again have maximum flexibility, within the guidelines provided below, in determining what constitutes the need for a performance test. For the purpose of determining when a performance test is required, OSPD personnel shall utilize the following general guidelines:

1. *30 CFR §254.45(a)(1) Modification:* OSPD personnel must document any number of modifications to the original design or any change or alteration, however slight, made to improve any part of the equipment or make it more suitable or enhance its operational functioning in order to require a performance test.
2. *30 CFR §254.45(a)(2) Damaged and Repaired:* OSPD personnel has discretion through records reviews, visual identification or any other appropriate method of determining and documenting that damages and repairs have occurred on a particular piece of equipment in order to require a performance test.
3. *30 CFR §254.45(a)(3) Has claimed effective daily recovery capacity (EDRC) that is inconsistent with data otherwise available to BSEE:* OSPD personnel must provide legitimate and credible physical evidence whose authenticity can be corroborated of inconsistent EDRC data compared to that of what is assigned to the equipment in question before a performance test is authorized.



EVC Activity Limitations

Relative to regulatory applicability, it is important to summarize OSPD's policy regarding this capability. First, EVC activities originate with a plan holder's listed owned or contracted equipment. Requests for information regarding OSRO- or cooperative-owned equipment listed within a specific plan must always originate through the plan holder who lists it. This is beneficial to OSPD as it serves to confirm the status of the contractual relationship between the plan holder and OSRO and/or cooperative. Second, requiring an operations or performance test can only be conducted for one of the three reasons found in 30 CFR §254.45(a)(1), (2) and (3). Finally, OSPD will only conduct unannounced equipment deployment under its authority to conduct unannounced drills (See EVC Tier III and TEC).

Providing OSPD personnel with clear regulatory compliance direction when it comes to preparedness verification is difficult considering the limitations on authority outlined in the previous paragraph. However, the equipment preparedness verification meeting concept provides the necessary procedures for establishing compliance verification with the 30 CFR §254 citations found within Table 3-1. In fact, once the equipment verification preparedness meeting process is initiated, OSPD personnel have a great deal of flexibility and authority specific to Tier I records reviews and Tier II performance testing.

Summary

The purpose of preparedness verification meetings is to determine if the oil spill response equipment that the O/Os list in their OSRPs is ready to be used during an oil spill response. Oil spill response equipment is the "life blood" of any OSRP, and plan holders must be motivated to stay abreast of the level of preparedness for all of their own or contracted equipment. If done regularly and across the entire regulated community, the preparedness verification meetings will motivate the regulated community to ensure that all oil spill response equipment is maintained in accordance with the requirements found in 30 CFR §254.

Recall that even though the statutory authority for offshore facility inspections is broad, for 30 CFR §254 compliance activities, the same authority is significantly narrower in scope as it relates to the regulatory oversight and preparedness verification of oil spill response equipment. Therefore, strict adherence to the EVC SOPs will keep OSPD personnel from overstepping their regulatory authority and maintain a nationally consistent and comprehensive preparedness verification compliance program.



EVC-I: Equipment Preparedness Verification

The equipment preparedness verification process is managed in a step-by-step manner utilizing tiered regulatory activities that must be closely followed; these activities make up what is known as the equipment preparedness verification meeting (see the introduction part of this capability for more information). A summary of activities, activity deadlines, and a cross-reference for the proper use of forms within every part of the meeting is listed in Table 3-2 below.

Note that the OSPD preparedness verification team lead shall coordinate a meeting that verifies the preparedness of one selected OSRP and should be attended by all interested parties whenever possible, including other Government agencies (OGA), the plan holder or his/her representatives, and applicable OSROs or cooperatives and their representatives.

The equipment preparedness verification meeting should only occur once all offline record review activities have been completed. Tier I activities include offline records reviews as well as additional on-site records reviews. Everyone attending should have a clear idea of the preparedness verification meeting process. To the greatest extent possible, the plan holder and applicable OSROs and contractors shall be prepared to ensure that Tier I, II and III activities for any piece of response equipment listed in the OSRP are ready to be carried out as requested.



Equipment Preparedness Verification Meeting (EVC-1)

Activity	Timeframe	Form(s) Utilized	Comments	Other SOPs
OSRP Selection	On-site activities require minimum 5day notice to plan holder & OSRO	Preparedness Verification Worksheet (worksheet)	Use OSRP preparedness verification selection criteria found in Table 3-3 of this SOP.	
Tier I Records Review: Offline	Offline Tier I Records Review may commence at anytime prior to on-site activities	Worksheet: Part V Job Aid Checklist: Part 2	Utilize the worksheet and job aid checklist in concert to ensure that all required activities are documented and completed. The checklist substitutes for an ICS 214 for EVC SOPs.	
Schedule and Location Coordination	Minimum 5day notice to plan holder	Worksheet: Parts I and II	Location should be where most comprehensive records review can occur and provide access to equipment for potential performance testing. Multiple locations for one meeting are possible as long as OSPD personnel, in pairs, are located at every location.	
OGA Coordination	Minimum 48 hours prior to meeting	Worksheet: Part III	OGA participation and goals must be fully documented and any regulatory outcomes should be included for the administrative record.	
Pre-brief and Job Safety Analysis (JSA)	No more than 1 to 2 hours prior to meeting	Worksheet: Part II and IV Job Aid Checklist: Part 1	These may be done consecutively or concurrently, however all participants must take part in both the pre-brief and JSA. Utilize the worksheet and job aid checklist in concert to ensure that all required activities are documented and completed. The checklist substitutes for an ICS 214 for EVC SOPs.	
Initiating the Meeting	Day of meeting	Job Aid Checklist: Part 1	The team lead for OSPD shall initiate the meeting, make introductions, coordinate all personnel, make appropriate field decisions, and is solely authorized to speak on behalf of the OSPD Chief. Documentation, pictures, or other ancillary duties may be assigned to an assistant(s) as necessary. Utilize the worksheet and job aid checklist in concert to ensure that all required activities are documented and completed. The checklist substitutes for an ICS 214 for EVC SOPs.	
Tier I Records Review: Onsite	Day of meeting	Worksheet: Part V Job Aid Checklist: Part 2	Utilize the worksheet and job aid checklist in concert to ensure that all required activities are documented and completed. The checklist substitutes for an ICS 214 for EVC SOPs.	
Tier II Performance Testing	Day of meeting	Worksheet: Part VI & VII Checklist: Part 2 Supplemental Checklists Notice of Response Personnel Training Audit	Utilize the worksheet, job aid checklist, and equipment supplemental checklists in concert to ensure that all required activities are documented and completed. The checklist substitutes for an ICS 214 for EVC SOPs. During the performance test(s), the team lead has the option to conduct an equipment operator training verification audit as per the EVC-2 SOP.	EVC-2 TEC-4



Equipment Preparedness Verification Meeting (EVC-1)				
Activity	Timeframe	Form(s) Utilized	Comments	Other SOPs
Tier III Exercise Deployment	Day of meeting or up to 48 hours after initiation of meeting	Worksheet Part VIII Checklist Part 2 Supplemental Checklists Notice of Response Personnel Training Audit	Utilize the worksheet, job aid checklist, and equipment supplemental checklists in concert to ensure all required activities are documented and completed. The checklist substitutes for an ICS 214 for EVC SOPs. During the resource deployment, the team lead has the option to conduct an equipment operator training verification audit as per the EVC-2 SOP. Also, the team lead has the option to conduct exercise compliance verification as per the TEC SOPs.	TEC-1 EVC-2 TEC-4
Wrap-up and Results Notification	Day of meeting	All worksheets, checklists, and audit forms	Utilize the worksheet, job aid checklist, and equipment supplemental checklists in concert to ensure all required activities are documented and completed. The checklist substitutes for an ICS 214 for EVC SOPs. All worksheets, checklists, and audit forms shall be completed to the greatest extent practicable and copies shall be provided to the plan holder or plan holder's representative. A brief review of the completed worksheet shall be provided to any interested party. An equipment preparedness verification results letter will be sent within 10 working days that will formally announce the final results of the meeting. No comments should be made at this time on any potential enforcement action(s).	
Post meeting	Within 5 working days after meeting	Administrative record shall include all related forms	The administrative record for the entire equipment preparedness verification meeting process shall be completed, the equipment preparedness verification results letter drafted, and recommended corrective action and/or enforcement shall be provided to the appropriate OSPD supervisor for review within 5 working days. Once the file has been reviewed and approved, the team leader has another 5 working days to complete any enforcement action.	ENF
Corrective Action and Enforcement	Not to exceed 10 working days from initiation of meeting	Copies of all incident of noncompliance (INC)	The entire administrative records should be completed, reviewed, and approved. The results letter should be sent for delivery with the appropriate corrective action request and/or INC.	ENF

Table 3-2. Equipment Preparedness Verification Meeting Activity Matrix



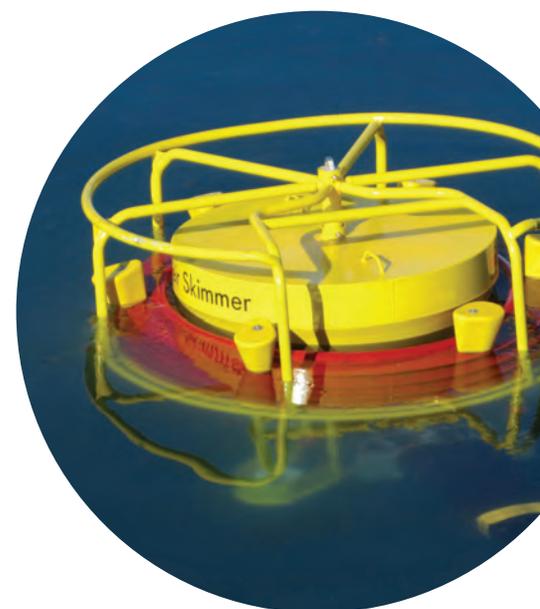
Equipment Preparedness Verification Meeting: OSRP Selection Criteria	Majority of equipment listed in the OSRP has never been deployed in an exercise or otherwise been preparedness verified.
	Any of the equipment listed in the OSRP has not been exercise deployed or otherwise had its preparedness verified in over 3 years.
	Equipment listed within the OSRP has a history of improper records, failed during an exercise, or is under any kind of manufacturer notice or recall.
	Plan holder has a recent history (within 3 years) of 30 CFR §254 compliance issues.
	Plan holder has a recent history (within 3 years) of other regulatory compliance issues.
	Plan holder had a significant change to his/her approved OSRP.
	OSRP's primary contractor-owned equipment has a capability or management change.
	OSPD is directed to initiate an equipment preparedness verification meeting with plan holder.

Table 3-3. OSRP Equipment Preparedness Verification Meeting Selection Criteria

EVC-2: Equipment Verification: Spill Response Operator Training

Equipment operator training verification utilizes the same process and forms as those used in the Response Personnel Training Audit (RPTA) program described within the TEC-4 SOPs. OSPD personnel have the flexibility to do equipment operator training verification separately or in conjunction with other regulatory activities, such as the equipment preparedness verification meeting. It is highly recommended that if Tier II activities commence as a result of the equipment preparedness verification meeting, OSPD personnel conduct an equipment operator training verification audit as well.

Regulatory personnel should refer to the RPTA section (TEC-4) of the OSPD Manual and utilize the appropriate forms to conduct the audit. The RPTA documentation should remain as part of the official record associated with the equipment preparedness verification meeting. An RPTA done in conjunction with a Tier III resource deployment should also remain in the preparedness verification administrative record. A copy of the completed RPTA may be placed within a TEC administrative record if OSPD personnel believe the information is pertinent to both TEC and EVC activities.



EVC Capability: Appendix Reference

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Appendix BB EVC Control Sheet.....	BB111





Section 4 - Incident Response and Notification Capability (IRC)



Introduction

The Oil Spill Preparedness Division (OSPD) has two distinct standard operating procedures (SOPs) under the Incident Response Capability (IRC)—Offshore Incident Spill Response and Notification Compliance and Incident Response Support. Of these two SOPs, only offshore incident spill response and notification (IRC-1) has a clear regulatory compliance component. The compliance activity found in IRC-1 is linked to the general response plan and reporting requirements found in 30 CFR §254. The IRC-2 SOP establishes technical assistance protocols, creates the Trusted Agent Program, and includes internal personnel accountability management.

Background

Under IRC-1 and IRC-2, OSPD has two basic categories of activities—conducting an Incident Preparedness Analysis (IPA) and providing technical assistance/serving as a Trusted Agent, respectively. Each activity has duty positions filled by OSPD staff, assigned to it that ensure the activity is completed successfully. IPA's initiated under OSPD's 30 CFR §254 authority are managed by the person who is acting as the duty Pollution Preparedness Analyst (PPA).

The PPA position must be filled by qualified OSPD personnel and staffed on a rotational basis by a member of the OSPD Duty Team. The duty PPA may be assisted, as necessary, by technical assistance duty positions, which are in turn filled by Pollution Preparedness Specialists (PPS) and/or the Support Officer (SO). Under IRC, each duty position has a job description and job task breakdown associated with it, and both activities have a minimum number of personnel assigned to them based on the complexities of the activity. The duty positions, duty rotations, response readiness levels and minimum personnel assigned per task are clearly identified within this document. Table 4-1 lists the tasks for which each duty position is responsible.

<i>IRC-1: Offshore Facility Spill Response and Notification</i>		<i>IRC-2: Incident Response Support</i>	
Primary Task: Incident Preparedness Analysis		Primary Tasks: Technical Assistance or Trusted Agent	Response Readiness Level
Part-I: Initial Preparedness Review		Non-deployed	2
Part-II: Follow-up Report Evaluation		Deployed: On-Site or incident command post (ICP)	1
Part I & II (as required)	IPA Administrative Record	Active spill	
	Preparedness Recommendations		
Assigned Duty Position(s)			
Primary: Pollution Preparedness Analyst Secondary: Pollution Preparedness Specialist, Support Of- ficer or Trainee		Primary: Pollution Preparedness Specialist Secondary: Support Officer or Trainee	

Table 4-1. Regulatory tasks assigned to duty positions per Incident Response Capability SOP.



Incident Response Readiness

Internal Duty Positions

As mentioned previously, several duty positions have been developed to further delineate and provide clarity to those tasks required under the IRC SOPs. The duty positions include the PPA, PPS, SO and/or Trainee. Their individual job descriptions and typical duties are listed within Tables 4-2a thru 4-2e. Note that there is no rank or seniority that accompanies these duty positions, no hazard pay, or any such incentives; they are simply designed to incorporate daily duty job tasking seamlessly into the routine regulatory operations and organization of each OSPD Section. The duty positions should be filled based on each person's specific educational background, training, and experience with the exception of the support officer or trainee. This duty position shall be filled with the most junior or least experienced person for purposes of mentorship and advanced on-the-job training. Once the trainee has obtained enough pertinent on-the-job experience with both IPA and response deployment, he/she can be placed in other duty positions.

Incident Response Pollution Preparedness Duty Position Descriptions	
Pollution Preparedness Analyst (PPA)	<p>Pollution preparedness analysts work closely with, and receive support from, all levels of Government (Federal, state, local, territories, and tribal) including engineers, scientists, occupational health and safety specialists, legal advisors, mineral resource managers, public affairs specialists, and others involved in investigation, analysis or evaluation of pollution incidents originating from offshore platform oil discharge incidents. Typical duties include:</p> <ul style="list-style-type: none"> • Review and evaluate suspected violations regarding unreported or underreported oil pollution discharges • Determine which spill reports to investigate, and coordinate compliance and enforcement activities with other BSEE offices and Government agencies • Analyze and evaluate compliance with all spill reporting requirements • Review O/O submitted response preparedness evaluations for one barrel or greater spills • Conduct evaluation of response preparedness in relation to general requirements found within the applicable and approved Oil Spill Response Plans (OSRPs) • Determine the nature of suspected violations and obtain information regarding suspected violations • Monitor follow-up actions in cases where violations were found, and review compliance monitoring reports • Research and keep informed of pertinent information and developments in areas such as BSEE laws, regulations, notice to lessees, and other compliance-related guidance documents • Prepare written, oral, tabular, and graphic reports summarizing requirements and regulations, including enforcement documentation • Coordinate with incident investigation teams and provide recommendations on pertinent information to collect, potential violations, and data interpretation. • Prepare, organize, and maintain inspection and/or training records • Determine the nature of regulatory violations and actions to be taken, and issue incidents of noncompliance (INCs); participate in enforcement hearings as necessary • Learn and observe proper safety precautions, rules, regulations, and practices so that unsafe conditions can be recognized and proper safety protocols implemented • Inform individuals and groups of pollution preparedness regulations and as appropriate, summarize inspection findings, explain how problems can be corrected • Inform other regulatory/compliance professionals, and the O/O about potential or actual oil pollution problems related to offshore spills

Table 4-2a. OSPD Duty Team Position Descriptions.



Incident Response Pollution Preparedness Duty Position Descriptions

Pollution Preparedness Specialist (PPS)

Pollution preparedness specialists work closely with, and receive support from, all levels of Government (Federal, state, local, territories, and tribal) including engineers, scientists, occupational health and safety specialists, legal advisors, mineral resource managers, public affairs specialists, and others involved in preventing, preparing, responding, recovering, and mitigating offshore platform oil discharge incidents. Typical duties include:

- Ensure compliance with pollution preparedness directives, regulations, policies, standards, and guidance
- Assist, as appropriate, the regulated community with interpretation and implementation of oil pollution preparedness standards, regulations, practices, training, and procedures to minimize or eliminate oil pollution threats and actual incidents
- Analyze, evaluate and assess OSRP processes, SOPs, or guidance for compliance with established pollution preparedness directives, regulations, policies, standards, and guidance
- Advise other regulatory/compliance professionals on OSRPs, recordkeeping, drills/exercises, and oil spill response equipment
- Provide technical expertise and advice on preparedness and response activities to eliminate or mitigate discharges associated with offshore oil exploration
- Develop plans to ensure that OSPD will continue essential functions during ongoing spill investigations and/or responses
- Analyze, review, and implement activities supporting OSPD continuity of operations (COOP), continuity of government, and other contingency planning;
- Provide incident response and preparedness training, exercises, and assistance expertise to those that request within the National Response System (NRS)
- Manage components of pollution preparedness program and activities during a response, including ICP activation and operations
- Determine needed and available resources (e.g., technical expertise, equipment, infrastructure) and capacities, as well as future resources, to support incident response activities
- Propose alteration of emergency response procedures based on regulatory changes, technological changes, or knowledge gained from outcomes of previous emergency situations
- Maintain and update all resource materials associated with emergency preparedness plans
- Keep informed of Federal, state and local regulations affecting emergency plans, and ensure that plans adhere to these regulations
- Prepare emergency situation status reports that describe response and recovery efforts, needs
- Attend meetings, conferences, and workshops related to emergency management in order to learn new information and to develop working relationships with other pollution preparedness specialists
- Assess safety compliance or operational risks and develop risk management strategies by completing a job safety analysis

Table 4-2b. OSPD Duty Team Position Descriptions.



Incident Response Pollution Preparedness Duty Position Descriptions	
Pollution Preparedness Support Officer/Trainee	<p>Pollution preparedness support officers or OSPD trainees work closely with pollution preparedness analysts and specialists by providing technical assistance, coordination, and communication as well as performing other duties as assigned. The support officer or trainee will not deploy alone and will assist any other Government agencies involved in preventing, preparing, responding, recovering, and mitigating offshore platform oil discharge incidents. Typical duties include:</p> <ul style="list-style-type: none"> • Assist the duty analyst and/or specialist as requested • Provide reach-back assistance for duty analyst and/or specialists deployed to an ICP • Assist with assessing safety compliance or operational risks and develop risk management strategies by completing a job safety analysis • Assist with implementation of better communication, monitoring, or enforcement activities of 30 CFR §254 regulatory activities related to the ongoing incident and/or IPA • Provide assistance to deployed personnel with regard to specific OSRP data, complete reviews and carry out other pollution preparedness compliance activities as directed • As needed, conduct onsite evaluations of recordkeeping procedures to meet the requirements for offshore pollution preparedness and provide technical assistance with regard to the procedures during an incident and/or IPA • Research the regulatory history of specific O/O, keep informed about compliance trends, and assess the possible impact of any changes to what is stipulated within the applicable OSRP • Maintain situational awareness of approval status of other necessary plans and environmental permits required by applicable owner/operator • As needed, provide support to, assist in, and participate in any official negotiations with other Government agencies about environmental permitting (e.g. National Pollutant Discharge Elimination System) and other pertinent compliance issues • Provide regulatory guidance to offshore facility management and other relevant operators as directed • Assist in review or updates to policies in order to ensure compliance with any applicable pollution preparedness guidance, standards, or regulations

Table 4-2c. OSPD Duty Team Position Descriptions.

Duty Teams

The nature of oil spill reports is that they can come at any time, without warning, especially with the various reporting thresholds and requirements found in 30 CFR §254.46. Multiple reports may also be received at any one time, requiring concurrent initial and/or field deployments (see Table 4-4 for oil and chemical reporting requirements).

The goal of this SOP is to ensure sustainable preparedness compliance despite the complexities of operating in the offshore environment. Therefore, if OSPD is ensuring maximum spill reporting, and completing compliance verification activities in a fair and consistent manner, O/O of offshore facilities will respond with more thorough and robust OSRPs and overall response readiness. Given the operational paradigm of the offshore-regulated community, OSPD must develop a workable readiness posture within current staffing levels. To accomplish this, the IRC SOPs stipulate a carefully managed duty rotation consisting of trained personnel assigned to specific job-tasks. The IRC adopts that response workload management tactic by creating pollution preparedness Duty Teams, consisting of duty positions (already described) on a specific duty rotation. The Duty Teams readiness level is determined by ongoing oil spill incident activity. Refer to IRC-2 for further information regarding OSPD readiness levels.



Duty Rotations

In order to carry out the objectives and meet the goals of the IRC, a duty rotation of OSPD personnel must be instituted. While the duty rotation system will primarily impact and benefit the Gulf Oil Spill Preparedness Section, the rotation will work across all Sections and is set up to establish, as a matter of OSPD policy, internal back-up assistance for all Sections. The design of the duty rotation system is based on the current staffing of each OSPD office. The duty rotation system consists of teams of individuals, made up of personnel with specific job-related qualifications that fit into the internal job descriptions listed above in Table 4-2a-c.

The duty rotation will not create new tasking; rather it will more fairly distribute IRC work across each OSPD Section. Each duty rotation is staffed with personnel that take turns with duty responsibilities for a predetermined amount of time. The IRC SOPs recommend 1-month rotations, but may be reduced with the OSPD Chief’s approval. The minimum number of personnel filling the duty positions (three per team in the Gulf and two per team in California and Alaska) shall not be altered without the OSPD Chief’s approval.

Incident Notification and Response Capability Duty Schedule					
		Gulf of Mexico		California	Alaska
		Team A	Team B	CA Team	AK Team
Minimum staffing duty roster	Analyst	Analyst	Analyst	Analyst or Specialist	Analyst or Specialist
	Specialist	Specialist	Specialist	Analyst or Support Officer	Analyst or Support Officer
	Support Officer or Trainee	Support Officer or Trainee	Support Officer or Trainee	<i>Only two-member teams in both CA and AK*</i>	
	<i>3 members*</i>	<i>3 members*</i>	<i>3 members*</i>	<i>*All Sections may request assistance</i>	

Table 4-3. IRC SOPs duty schedule per OSPD Section.

Regulatory Applicability

Table 4-4 includes all the statutes that require O/O to report spills of oil or chemicals to the NRS. As stated previously, the IRC-2 SOP establishes the methodology for OSPD to provide spill response technical assistance within the NRS. However, not all response support will include an IPA as described in IRC-1. IPAs may be initiated concurrently with incident response support, but for some spills, OSPD will not have IPA authority. For instance, releases of a hazardous substance from an offshore facility may require technical assistance from OSPD, but is not included in the spill incident follow up reporting required by 30 CFR §254.46.





Notification Requirements: Mandatory Oil and Chemical Spill Reporting

OSPD Requirements

30 CFR §254.46 (a)	<p>Whom do I notify if an oil spill occurs?</p> <p>(a) You must immediately notify the National Response Center (NRC) at 1-800-424-8802 if you observe:</p> <ul style="list-style-type: none"> (1) An oil spill from your facility (2) An oil spill from another offshore facility (3) An offshore spill of unknown origin
30 CFR §254.46 (b)	<p>(b) In the event of a spill of one barrel or more from your facility, you must orally notify the Regional Supervisor without delay. You also must report spills from your facility of unknown size but thought to be one barrel or more.</p> <ul style="list-style-type: none"> (1) If a spill from your facility not originally reported to the Regional Supervisor is subsequently found to be one barrel or more, you must then report it without delay. (2) You must file a written follow-up report for any spill from your facility of one barrel or more. The Regional Supervisor must receive this confirmation within 15 days after the spillage has been stopped. All reports must include the cause, location, volume, and remedial action taken. Reports of spills of more than 50 barrels must include information on the sea state, meteorological conditions, and the size and appearance of the slick. The Regional Supervisor may require additional information if it is determined that an analysis of the response is necessary.

NRS Requirements

33 CFR §153.203	<p><i>Procedure for the notice of discharge. Any person in charge of a vessel or of an onshore or offshore facility shall, as soon as they have knowledge of any discharge of oil or a hazardous substance from such vessel or facility in violation of section 311(b)(3) of the Act, immediately notify the National Response Center (NRC), U.S. Coast Guard, 2100 2nd St., SW, Stop 7238, Washington, DC 20593-7238, toll free telephone number: 1-800-424-8802, direct telephone: or at (202) 267-2675, or Fax: (202) 267-1322. If direct reporting to the NRC is not practicable, reports may be made to the Coast Guard or EPA predesignated on-scene coordinator (OSC) for the geographic area where the discharge occurs. All such reports shall be promptly relayed to the NRC. If it is not possible to notify the NRC or the predesignated OSC immediately, reports may be made immediately to the nearest Coast Guard unit, provided that the person in charge of the vessel or onshore or offshore facility notifies the NRC as soon as possible. A report made under this section satisfies the reporting requirements of 151.15 of this chapter and of 46 CFR §4.05-1, if required under that provision.</i></p>
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Notification Requirements: Mandatory Oil and Chemical Spill Reporting	
40 CFR §302.6 (a)	<i>Any person in charge of a vessel or an offshore or an onshore facility shall, as soon as he or she has knowledge of any release (other than a federally permitted release or application of a pesticide) of a hazardous substance from such vessel or facility in a quantity equal to or exceeding the reportable quantity determined by this part in any 24-hour period, immediately notify the National Response Center (NRC) (at the toll free number 1-800-424-8802); in Washington, DC, or at, (202) 267-2675; the facsimile number is (202) 267-1322).</i>
40 CFR §110.6	<i>Any person in charge of a vessel or of an onshore or offshore facility shall, as soon as he or she has knowledge of any discharge of oil from such vessel or facility in violation of section 311(b)(3) of the Act, immediately notify the National Response Center (NRC) at the toll free number 1-800-424-8802; in the Washington, DC metropolitan area, (202) 426-2675. If direct reporting to the NRC is not practicable, reports may be made to the Coast Guard or EPA predesignated On-Scene Coordinator (OSC) for the geographic area where the discharge occurs. All such reports shall be promptly relayed to the NRC. If it is not possible to notify the NRC or the predesignated FOOSC immediately, reports may be made immediately to the nearest Coast Guard unit, provided that the person in charge of the vessel or onshore or offshore facility notifies the NRC as soon as possible. The reports shall be made in accordance with such procedures as the Secretary of Transportation may prescribe. The procedures for such notice are set forth in U.S. Coast Guard regulations, 33 CFR part 153, subpart B and in the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR part 300, Subpart E.</i>
40 CFR §117.21	<i>Any person in charge of a vessel or an onshore or an offshore facility shall, as soon as he has knowledge of any discharge of a designated hazardous substance from such vessel or facility in quantities equal to or exceeding, in any 24-hour period, the reportable quantity determined by this part, immediately notify the appropriate agency of the United States Government of such discharge. Notice shall be given in accordance with such procedures as the Secretary of Transportation has set forth in 33 CFR 153.203. This provision applies to all discharges not specifically excluded or reserved by another section of these regulations.</i>

Table 4-4. Regulatory citations for oil and chemical spill incident reporting.

Summary

For a comprehensive look at OSPD personnel requirements under the IRC SOPs, refer to Table 4-10, the Incident Response and Regulatory Activity Matrix. This matrix provides a crosswalk from the regulatory requirements for each IRC SOP, to associated OSPD actions, and finally to the type and minimum duty personnel necessary to carry out those actions. The incident response and regulatory activity matrix also lists appropriate forms and documentation that may be required and any briefing thresholds for OSPD, BSEE, or the Department of the Interior (DOI).



It should be noted that experienced responders are not born from training classes, but from on-the-job training responding to spills, working within an ICP, and utilizing the Incident Command System (ICS). Field experience related to spill response, attending ICS training courses, and adhering to the IPA protocols will assist in the creation of a seasoned group of reliable, deployable OSPD personnel capable of conducting IPAs, providing technical assistance, and/or acting as a Trusted Agent.

IRC-I: Spill Response & Notification Compliance

The objective of this SOP is to establish how OSPD will conduct an Incident Preparedness Analysis (IPA). IRC-1 establishes the threshold for, and policies related to, OSPD's duty PPA and how he or she will conduct IPAs involving offshore facilities or other locations to verify compliance with 30 CFR §254.5(a), (b), (c) and (d), 30 CFR §254.46 (a), (b) and (c) and other applicable spill reporting laws and regulations.

In general, the IPA (Part I and II) is designed to determine whether a plan holder's response to an oil spill from their facility was sufficient given the general response plan requirements established in 30 CFR §254.5 **General response plan requirements:**

- (a) *The response plan must provide for response to an oil spill from the facility. You must immediately carry out the provisions of the plan whenever there is a release of oil from the facility. You must also carry out the training, equipment testing, and periodic drills described in the plan, and these measures must be sufficient to ensure the safety of the facility and to mitigate or prevent a discharge or a substantial threat of a discharge.*
- (b) *The plan must be consistent with the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) and the appropriate Area Contingency Plan(s) (ACP).*
- (c) *Nothing in this part relieves you from taking all appropriate actions necessary to immediately abate the source of a spill and remove any spills of oil.*
- (d) *In addition to the requirements listed in this part, you must provide any other information the Regional Supervisor requires for compliance with appropriate laws and regulations.*

Incident Preparedness Analysis Process

In order to better understand the scope of the IPA process, the definition of an IPA and the role of the PPA are defined here:

1. The IPA is an inquiry for the purpose of determining whether applicable statutes or regulations were followed, and if not, formulating recommendations for corrective action and disseminating lessons learned to appropriate parties. An IPA requires an objective gathering and analysis of information, which will ensure that the final analysis is as accurate as possible. The IPA consists of two parts, the length of which depend on the findings of fact, whether there are corrective action recommendations, OSRP revision requirements and/or enforcement actions.





- a. Part I is a fact based analysis of any spill reports from 30 CFR §254 facilities that evaluates the spill reporting compliance, the immediacy and accuracy of the spill report and a notification procedure consistency review with the approved OSRP.
 - b. Part II is a fact based analysis of any follow-up reports required under 30 CFR §254.46(b) and may be conducted independently from a Part-I IPA. Also, a Part-II IPA may include an entirely separate set of corrective action recommendations, OSRP revision requirements and/or enforcement actions.
2. The PPA shall conduct IPAs following a report of any oil spill incident in order to discover incident specific preparedness gaps or issues. The preparedness gaps or issues discovered should then be analyzed to determine how they are best addressed relative to 30 CFR §254 preparedness requirements, to include approved OSRP plan revisions. The PPA has an obligation to identify and obtain relevant information from all available sources in order to resolve all of the issues under analysis.

It is vital for the PPA to understand that the IPA does not preempt, prevent or overlap ongoing civil or criminal investigations conducted by BSEE. The IPA is limited to preparedness issues only and is an important feedback process to ensure that

1. The approved OSRP is being carried out following an oil spill incident,
2. That the regulatory reporting requirements are being met by the plan holder, and
3. That the incident is fully evaluated and analyzed to improve on the entire preparedness process and the O/O's preparedness/readiness status.

It is also important to understand the difference between the PPA's focus compared to that of the U.S. Coast Guard's (USCG's) Pollution Investigator (PI). For example, the USCG PI will focus on the fact that the spill occurred and ensure appropriate response and removal actions are taken afterward. The USCG will also ensure that the overall response is consistent with the NCP and provide Federal On-Scene Coordinator (FOSC) response oversight as necessary (See Table 4-5 for more information).

The IPA focus shall be the facilities preparedness level prior to the incident and ensure that their actions were consistent with their approved OSRP, verify the accuracy of the spill notification, and evaluate compliance with the notification requirements. The OSPD PPA will ensure that proper follow-up reporting occurs and that referrals to other BSEE officials are prompt and accurate. Proper intra-agency coordination during an IPA is imperative, as OSPD's analytical focus does not include prevention. The IPA process will measure the ability of the OSRP to be enacted and work according to plan specifics, and will provide the regulated entity with incident-specific feedback in addition to any regulatory follow up, especially if the spill is over one barrel.

OSPD's unique focus on the preparedness and notification aspect of an oil spill requires a standardized, thorough, and manageable analytical process. Whenever possible, the IPA process should be part of an ICS organization (See Table 4-8 for ICS positions that OSPD personnel shall fill during an oil spill incident). Additionally, personnel conducting IPA tasks outside the office environment shall follow all applicable safety rules and maintain the buddy system with at least one other BSEE employee.



Incident Preparedness Analysis Parts

The two-Part IPA process corresponds to the regulatory authority discussed in the introduction section of this capability. The two Parts of an IPA are:

1. Initial preparedness review (30 CFR §254.5 and 30 CFR §254.46(a))
2. Follow-up report evaluation (30 CFR §254.5 and 30 CFR §254.46(b))

The IRC SOP includes several forms that assist in the IPA process. The IPA Datasheet assists the PPA by documenting all appropriate incident related documents and organizing collected information into an administrative record. Once the IPA is complete the PPA utilizes the datasheet and all other related forms to document and link the IPA to OSRP revisions, corrective actions and/or enforcement actions as appropriate.

The IPA's sole focus is on the preparedness aspect of the oil spill incident. To assist the PPA and remove potential confusion, Table 4-5 compares and contrasts prevention, preparedness, and response regulatory schemes. In order to complete an IPA, the PPA must ensure that coordination on a complex incident response takes place both internally and externally to OSPD. While Table 4-5 is not an exhaustive list, it does highlight the different analytics that must be reviewed with regards to preparedness once an oil spill incident occurs. The PPA shall ensure that only facts and information related to preparedness are collected to support IPA conclusions, OSPD decisions, and corrective or enforcement actions.



Potential Incident Analytical Questions per Regulation					
Types of Oil Pollution Regulatory Controls	30 CFR §250: Prevention (BSEE Region Focus)		30 CFR §254: Preparedness (OSPD Focus)	40 CFR §300: Response (USCG Focus)	
	Definitions		<p>Pollution prevention describes activities that reduce the amount of pollution generated by a process, whether it is consumer consumption, driving, or industrial production. In contrast to most pollution control strategies, which seek to manage a pollutant after it is formed and reduce its impact upon the environment, the pollution prevention approach seeks to increase the efficiency of a process, thereby reducing the amount of pollution generated at its source.</p>	<p>Pollution preparedness refers to specific actions that may be required by regulation or relevant standards and that are taken as precautionary measures to ensure that a responsible party can adequately respond to an oil spill. These actions can include both physical preparations (such as on-call oil spill response organizations, writing oil spill response plans) and trainings for spill management teams. Preparedness is an important quality in achieving goals and in avoiding and mitigating negative outcomes.</p>	<p>Pollution response is a term for a series of appropriate and/or regulatory required actions and precautions taken by a responsible party or their surrogate in the event of an environmental incident.</p>
	Potential Questions		Initial Actions:	Initial Response Actions:	Post-Emergency Response Actions:
	Initial Actions:	Initial Response Actions:	Post-Emergency Response Actions:	Initial Actions:	Initial Response Actions:
	Were appropriate pollution reduction measures taken?	Was pollution reduction via engineering controls initiated, installed, or performed properly and in accordance with regulation?	Were provisions of the OSRP carried out following a discharge of oil from the facility and, if so, were they effective? If the OSRP provisions were not effective in responding to the oil discharge or threat of oil discharge, are OSRP revisions required?	Were previously recommended pollution prevention controls instituted promptly?	
	Were appropriate pollution reduction measures taken?	Was the discharge reported immediately? Were follow-up reports filed as required (based on quantity spilled) with all necessary information? Has the information been verified?	Was the responsible party's response personnel (QI, Spill Response Management Team (SRMT), etc.) adequately trained and prepared to respond?	Was the discharge reported immediately, or as soon as the responsible party had knowledge? Is the information accurate?	
	Were appropriate pollution reduction measures taken?	Was the responsible party's response personnel (QI, Spill Response Management Team (SRMT), etc.) adequately trained and prepared to respond?	Did the responsible party take action in accordance with the NCP and/or as directed by the Federal On-scene Coordinator (FOSC)?	Did the responsible party take action in accordance with the NCP and/or as directed by the Federal On-scene Coordinator (FOSC)?	
	Were previously recommended pollution prevention controls instituted promptly?	Were provisions of the OSRP carried out following a discharge of oil from the facility and, if so, were they effective? If the OSRP provisions were not effective in responding to the oil discharge or threat of oil discharge, are OSRP revisions required?	Are all onsite responders trained to appropriate Occupational Safety and Health Administration standards?	Are all onsite responders trained to appropriate Occupational Safety and Health Administration standards?	

Table 4-5. Example post oil spill analytical focus matrix.



Part I: Initial Preparedness Review

Each day, the OSPD PPA shall review NRC reports, Regional Supervisor referrals, or other sources of offshore spill information and ensure that spills are being reported and followed up on as per 30 CFR §254.5 and 30 CFR §254.46. Once a spill report or some other actionable information suggests that 30 CFR §254 compliance needs to be further evaluated, a Part-I IPA shall be initiated. As part of every Part-I IPA, OSPD personnel shall cross-reference the incident details with the applicable OSRP and conduct an internal regulatory history check.

Part II: Follow-up Report Evaluation

A Part-II IPA should be conducted whenever 30 CFR §254.46(b) requirements are applicable to an oil spill incident. Applicable oil spill incidents are when 1 barrel or greater of oil is discharged from a 30 CFR §254 regulated facility. A Part-II IPA ensures that the follow up report required by 30 CFR §254.46(b) was thoroughly reviewed and generates an administrative record. The IPA datasheet is utilized for Part-II IPAs and shall reference any related INCs and/or required OSRP revisions. OSPD personnel tasked to complete regulatory activities that originated from an IPA must conduct those activities consistent with applicable OSPD Manual SOPs.

Incident Preparedness Analysis Protocols

The PPA must utilize established administrative and regulatory protocols and procedures when conducting an IPA. He or she shall ensure routine communications occur between OSPD and BSEE's established compliance and enforcement directorate. For high profile incidents involving either multiple response agencies or with high media interest the PPA shall coordinate any required messaging through the OSPD Chief.

When appropriate, collaboration, cooperation, and communication with stakeholders, other Government agencies and the private sector may be necessary to complete an IPA. All documents related to an IPA must be stored securely and managed as For Official Use Only (FOUO). Some aspects of the IPA may contain private and/or confidential business information that shall not be released unless or until the OSPD Chief or his designee has determined that the release complies with the Freedom of Information Act and/or the Privacy Act. Additionally, the IPA administrative record should link back to the applicable and approved OSRP and any other regulatory activities initiated due to IPA recommendations.

Incident Preparedness Analysis: Summary of Actions

1. Duty pollution preparedness analyst reviews daily spill reports
 - a. Maintains situational awareness on all spill reports from facilities in the designated area of responsibility
 - b. For every such reported spill, reviews for IPA applicability



2. If applicable, complete a Part-I IPA:
 - a. Evaluate compliance with 30 CFR §254.46(a)
 - b. Evaluate compliance with 30 CFR §254.5
3. If applicable, complete a Part-II IPA:
 - a. Ensure compliance timelines and review the required follow up report provided by the owner/operator as per 30 CFR §254.46(b)
 - b. Evaluate compliance with 30 CFR §254.5
4. Coordinate all IPA activities with the appropriate Regional Supervisor (e.g., Field Operations) that may include activities conducted by personnel in those offices (e.g., inspectors or engineers)
5. As appropriate, coordinate with USCG Pollution Investigators during actual spill response
6. Report critical incident information regularly to OSPD HQ
7. Complete required forms, compile information, and submit IPA and any associated records and/or report(s) in accordance with the administrative record process to appropriate OSPD supervisor for review
8. For Gulf Oil Spill Preparedness Section only: As necessary, with PPA recommendation and OSPD Section Chief approval, the PPA should conduct an IPA brief to OSPD staff for potential OSRP revisions, Government Initiated Unannounced Exercise (GIUE) discussions or other potential regulatory activities that may be warranted in accordance with the IPA findings.
9. For CA and AK: IPA should be reviewed for impact on applicable and approved OSRPs, GIUE decisions and other regulatory activities that may be warranted in accordance with the IPA findings

Pollution Preparedness Analyst Protocols

When conducting an IPA, the PPA should follow these general analytical protocols:

1. Never include opinions in any official communication
2. State/write the facts based on the available information
3. Quickly determine whom to coordinate with internal and external to BSEE
4. Decide when enough information has been collected to justify corrective action and enforcement recommendations
5. Remain professional and polite at all times
6. Be a good listener





The PPA shall complete some or all of the following actions while conducting an IPA:

1. Request for information (as necessary)
2. Coordinate information gathering from other BSEE representatives
3. Make an onsite visit (as necessary)
4. Obtain as much pertinent information as available
5. Analyze information obtained
6. Complete forms, write summary report(s), create the administrative record

Information requested should be related to the issues that triggered the IPA. An information request could contain some or all of the following:

1. The policies and procedures regarding the practice, procedure, or protocol that OSPD is evaluating and analyzing
2. Documents pertaining to OSPD's dealing with the O/O in the situation
3. Documents showing how other Government agencies may have interacted with the facility owner/operator
4. Documents showing how the OSRO or any other contractor was managed during the oil spill incident
5. A statement from the facility O/O addressing OSPD issues



IRC-2: Incident Response Support

The objective of this SOP is to establish direction and guidance for how and when OSPD employees shall provide incident specific technical assistance under the NRS, in accordance with 40 CFR §175(a), and/or any other request as deemed appropriate by the OSPD Chief. IRC-2 also establishes guidance for OSPD personnel who act as the BSEE Trusted Agent. The Trusted Agent will perform liaison duties between the USCG and BSEE personnel whenever requested.

Part I: Technical Assistance

IRC-2 utilizes the Duty Team system to carry out the assistance and subject matter expertise requirements within the NRS. Refer to the duty positions, schedule, and rotation information described within the IRC Introduction Section. Note that actions taken under this SOP are not related to regulatory oversight and compliance assurance; rather they are specific to providing technical assistance and subject matter expertise to the FOSC in responding, removing, and mitigating an oil spill that discharged from a 30 CFR §254 regulated offshore facility.

IRC-2 is purposely conceptual in nature and provides a general outline of responsibilities and expectations for OSPD personnel assigned to oil spill incident response. This SOP could not possibly cover every request received via the NRS; therefore, the Table 4-6 below provides a general list of the types of assistance that OSPD provides to other agencies:

All Response Readiness Levels	<i>IRC-2 Technical Assistance</i>	
	Primary Task	Technical Assistance
	Assistance Types	Non-deployed
		Deployed: On-Site or ICP
Assigned Duty Position(s)	Primary: Pollution Preparedness Analyst or Specialist Secondary: Support Officer or Trainee	

Table 4-6. Regulatory tasks assigned to duty positions for IRC-2.

OSPD personnel selected and deployed to the field to fulfill the technical assistance and/or subject matter experts (SMEs) role within a response or at an ICP shall support operations until relieved, replaced, or demobilized by incident command. Also, the OSPD Chief may choose to remove, remove and replace, or add training staff to any deployed personnel at any time. OSPD personnel may request deployment changes via the appropriate OSPD supervisor. The OSPD Chief will make any proposed deployed staffing changes necessary on a case-by-case basis.



Response Readiness Levels

OSPD's primary mission does not include maintaining a 24/7/365 incident response posture. However, OSPD should be able to provide NCP assistance when requested or when the OSPD Chief directs OSPD's presence at an incident. In order to better prepare and organize OSPD personnel for potential incident response duties, OSPD personnel have three response readiness posture levels as per Table 4-7 below:

Level	Response Readiness Levels	Readiness Posture
3	Incident Awareness	Routine Operations/Business Hours
2	Collection and/or Consultation	Active Spill: 24/7 as necessary (non-deployed)
1	Active	Active Spill: 24/7 as necessary (deployed)

Table 4-7. OSPD Response Readiness Posture Levels for IRC-2 Technical Assistance.

The response readiness levels are utilized along with the duty positions, teams and rotations introduced earlier within the IRC. Generally, OSPD remains at a level-3 readiness posture. The readiness posture changes only when there is an active spill from an offshore facility that is regulated by 30 CFR §254 or when OSPD personnel are activated via the Trusted Agent Program. Each OSPD Section will self-determine a change in the readiness level for a particular region. The posture level change must be declared to the OSPD Chief before compensatory time, over time or other off-hours compensation or travel is authorized. OSPD supervisors should estimate how long the readiness posture change will last when making this declaration to the OSPD Chief. At a minimum, OSPD supervisors must update any change to their response readiness posture to the OSPD Chief every 12 hours.

OSPD personnel should utilize the following general categories that justify deployment to an on-site response or an ICP:

1. A Unified Command is established for an actual or potential oil spill incident (including loss of well control) from a facility that has an approved OSRP
2. A Federal On-Scene Coordinator requests OSPD assistance
3. A plan holder deploys oil spill response equipment to abate an oil spill from their facility without direct over-sight or direction from a Federal On-Scene Coordinator



Incident Response Communication Expectations

OSPD activities related to an incident response, regardless of the response readiness posture level, must be communicated both laterally and vertically within BSEE. At any response readiness level, OSPD personnel may be asked to communicate ongoing and relevant information from an active oil spill incident response. OSPD personnel should utilize National Incident Management System (NIMS)/ICS documentation and concepts to easily communicate within BSEE.

OSPD personnel are expected to communicate to the OSPD Chief whenever the following occurs (note that this list is not comprehensive and depending on the exigencies of the incident, may be amended):

1. A 201 brief occurs
2. OSPD receives a resource request
3. Oil spill incident response *critical* developments
4. Any *deviation* from the applicable OSRP
5. USCG daily situation/pollution reports

In this context, 'critical' developments mean significant issues such as loss of well control, coastline impact, responders safety concerns, or other critical developments that impact incident response efficacy.

In this context, 'deviation' means any action taken during the incident response that is not consistent with the applicable OSRP. This should not be considered a negative condition warranting enforcement, rather a trigger for OSPD to investigate why the incident response necessitated a deviation from the applicable OSRP response recommendations. The deviation should be reported to the OSPD Chief and an IPA should be initiated when appropriate. See IRC-1 for information regarding how to conduct an IPA.

OSPD personnel, at any response readiness level assigned to an incident response must provide a daily update to the OSPD Chief. OSPD personnel should avoid re-creating the wheel as much as possible and work within the ICS/NIMS system. For instance, utilizing the 201 for an initial briefing to the OSPD Chief or using the USCG daily situation/pollution reports to provide an update on the incident response. OSPD personnel should also prepare a brief for BSEE Public Affairs, as directed by the OSPD Chief.

ICS Roles and Responsibilities During Deployment

As per the internal duty rotation requirements, deployed personnel must, at a minimum, go in pairs and shall be supported by dedicated personnel. Implementation of the internal duty positions ensure that travel requests, personnel issues, recall decisions and any other real-time decision is made promptly to support deployed personnel. Deployed personnel must ensure adequate communications back to the OSPD Section for dissemination throughout BSEE as required. For



AK and CA personnel, OSPD headquarters personnel should be assigned to provide assistance as necessary.

OSPD personnel who are deployment eligible shall be assigned personal protective equipment (PPE) as directed by applicable DOI, BSEE and OSPD safety policy. OSPD personnel who are deployment eligible shall be trained prior to any incident deployment as directed by applicable DOI, BSEE and OSPD training policy.

Deployed OSPD personnel must also coordinate with DOI's Office of Environmental Policy and Compliance to ensure that appropriate reimbursable expenses are documented. DOI's Environmental Compliance Memorandum No. ECM 12-4, dated October 25, 2012, gives specific guidance on how to obtain Pollution Removal Funding Authorizations (PRFA's) from Federal On-Scene Coordinators for reimbursable Oil Spill Response Activities. This memorandum is included as an appendix to the IRC SOPs.

Table 4-8 below provides additional NIMS/ICS compliant roles and position descriptions for OSPD personnel deployed to the field, with the exception when activated or deployed under the Trusted Agent program:

ICS/NIMS Roles For OSPD Personnel During Oil Spill Incidents			
ICS/NIMS Role and Description	Staffed by	CG-IMH Ref.	CG-IMH Ref.
		Ver: 8/2006	Ver:
Agency Representative (AREP): An AREP is assigned to the incident with delegated authority to make decisions on matters affecting that agency's participation in the incident. AREPs report to the Liaison Officer (LNO) or to the Incident Commander (IC) in absence of a LNO. OSPD personnel will provide assistance as a general SME for OSRPs, BSEE Field Offices and Regions, issues related to source control and other duties as assigned or as necessary.	PPA/PPS	Page: 6-5 & 6-6	
Technical Specialist (THSP): THSPs have specialized knowledge or expertise and may function within the Planning Section or be assigned wherever their services are required. OSPD personnel may be assigned as OSRP specialists, equipment and capability specialists, or other technical specialists wherever OSPD specific expertise is required and/or as assigned.	PPA/PPS/SO + Response Research Branch (RRB)	Page: 8-12 & 8-13	
Environmental Specialist (ENSP): Research and Development Specialist that may be assigned to conduct Alternative Technology (ART) Evaluations and/or other tasks as required or assigned.	RRB Only	Page: 8-12 & 8-13	

Table 4-8. Specific NIMS/ICS Roles for OSPD Personnel.

Deployed personnel shall not be assigned additional work while deployed and their current workload will be managed appropriately, depending on length of deployment. Once deployed personnel have returned to the office, they shall not resume regular work until all deployment related work products are completed and accepted as satisfactory. Supervisors shall work diligently to ensure that personnel deployed long-term (10 working days or greater) get the personal time necessary to ensure a smooth return to their routine work schedules.



It is recommended that deployed personnel complete a trip report to communicate any positive or negative situations in relation to the deployment. This will be the sole official method to provide feedback to the OSPD Chief regarding any deployment. OSPD personnel that have been deployed are encouraged to address any issues related to personnel, staffing, recourses, equipment, training, and SOPs within their trip report, but it must include recommendations.

Technical Assistance: Summary of Actions

1. OSPD Duty Team maintains oil spill incident situational awareness
2. If oil spill incident is reported, or deployment threshold(s) are met:
 - a. Brief appropriate OSPD supervisor, declare response readiness level change
 - b. Coordinate with USCG Incident Management Division
 - c. Coordinate with BSEE Region and/or District Office(s)
 - d. Ensure pre-deployment connectivity between ICP and OSPD Duty Team
3. Establish incident-specific intradepartmental lines of required communication
 - a. Deployed personnel daily briefing requirements
 - b. Personnel travel and logistics assistance with appropriate OSPD supervisor
 - c. Review OSPD deployment reporting thresholds and briefing standards
4. Post-deployment, provide Trip Report
 - a. Detail positives and negatives
 - b. Provide recommendations and lessons learned for future deployment scenarios
 - c. Describe OSRP deviations and/or recommended OSRP revisions

Part II: Trusted Agent Program

The OSPD Trusted Agent Program is activated during those incidents or situations where OSPD does not have clear jurisdiction or authority, but can provide specialized liaison assistance between the BSEE regional and district field offices (“BSEE field offices”) and the USCG or other NCP environmental response agencies. OSPD is uniquely suited to provide liaison and communication assistance for BSEE field offices, as OSPD routinely works side-by-side with both USCG pollution responders and BSEE regional and district personnel.

The OSPD Trusted Agent essentially fills the role of NIMS ICS LNO for incidents where ICS hasn’t been formally established or where two or more agencies need coordinating assistance. The Trusted Agent may be requested by the BSEE field offices, the USCG, or other NCP response agencies and be deployed onsite or offsite as necessary. Similar to an LNO, the Trusted Agent works to achieve mutual understanding or unity of effort between regulatory agencies, while remaining focused on the best utilization of resources. Once activated and assigned to a duty post, the Trusted Agent will maintain the Trusted Agent title until he/she is no longer required or until the Trusted Agent must transition into some other NIMS/ICS role, as required by a change in the incident or situation.



Knowledge of the incident and its geographic area and previously established relationships/familiarity with involved entities can greatly simplify or ease the job of the Trusted Agent. For this reason, local personnel who normally work within the impacted offshore-regulated community are good choices for the Trusted Agent role. To this end, OSPD personnel active in the local Area Committee and/or who attend Regional Response Team (RRT) meetings are good candidates for Trusted Agents.

Trusted Agent Roles and Responsibilities

For those incidents where a Trusted Agent is requested, a general set of protocols and actions have been identified. Upon the initial meeting with agency representatives, the Trusted Agent's primary responsibilities include, but are not limited to, the following:

1. Be a point of contact for agency representatives.
2. Maintain a list of assisting and cooperating agencies and agency representatives, O/O and their representatives, including name and contact information.
3. As appropriate, ensure that the needs of assisting and cooperating agencies are met.
4. Assist in establishing and coordinating interagency contacts.
5. Keep agencies supporting the incident aware of incident status.
6. If requested, work closely with the Public Information Officer to ensure a clear delineation of responsibility for stakeholder's interaction.
7. Monitor incident operation to identify current or potential inter-organizational problems.
8. Participate in coordination calls, planning meetings or other coordinated communication events, and provide limitations and capability of assisting agency resources.
9. Coordinate response resource needs for any other regulatory incident investigation or analysis requirements.
10. Ensure that all required agency forms, reports and documents are completed and shared between the appropriate agencies prior to stand-down or demobilization.
11. Debrief all appropriate agency representatives and the appropriate OSPD supervisor prior to stand-down or demobilization.
12. Meet all communication and coordination responsibilities as requested, yet inside the parameters established for the OSPD Trusted Agent.
13. Maintain an activity log (ICS 214).

Note that the list of roles and responsibilities above is not comprehensive and the Trusted Agent may need to improvise actions based on the needs of any given situation or incident. OSPD's Trusted Agent Program utilizes a similar response readiness level system, with level 2 representing non-deployed Trusted Agent activation and level 1 representing Trusted Agent activation that includes deployment.



Level	Response Readiness Levels	Readiness Posture
3	Incident Awareness	Routine Operations/Business Hours
2	Trusted Agent Activated	Active Incident: 24/7 as necessary (non-deployed)
1	Trusted Agent Activated	Active Incident: 24/7 as necessary (deployed)

Table 4-9. OSPD Response Readiness Posture Levels for IRC-2 Trusted Agent Program.

Generally, OSPD remains at a level-3 readiness posture. The readiness posture changes only when there is an active spill from an offshore facility that is regulated by 30 CFR §254 or when OSPD personnel are requested via the Trusted Agent Program. Each OSPD Section will self-determine a change in the readiness level for a particular region. The posture level change must be declared to the OSPD Chief before comp time or other off-hours compensation is authorized. OSPD supervisors should estimate how long the readiness posture change will last when making this declaration to the OSPD Chief. At a minimum, OSPD supervisors must update any change to their response readiness posture to the OSPD Chief every 12 hours.

Summary

The IRC-2 Part I and II SOPs establish guidelines for NRS related technical assistance and creates the OSPD Trusted Agent Program to assist BSEE Field Offices and USCG coordinate their respective regulatory duties. Trusted Agent requests should occur during incidents or in situations where OSPD has no definitive jurisdiction or authority, but has some expertise with each interested agency. OSPD's environmental response knowledge, combined with their connection to the offshore regulatory environment is extremely important whether requested to consult, provide technical assistance, or activated as a Trusted Agent. Therefore, it is incumbent on OSPD personnel to provide their expertise and professionalism in accordance with the procedures outlined within this SOP.

IRC Frequently Asked Questions

IRC-I Spill Response and Notification Compliance

Q1. What is the purpose of the Incident Preparedness Analysis (IPA)?

A1: An IPA is the preparedness related regulatory activities authorized by 30 CFR §254 following an oil spill from an OSPD regulated offshore facility. The IPA has been divided into two distinct Parts. Part I is a review to confirm compliance with the requirement to report a discharge of oil from an offshore facility as per 30 CFR §254.46(a). Part II is a review to confirm compliance with the requirement to provide a follow-up report following a discharge of oil greater than 1 barrel from an offshore facility as per 30 CFR §254.46(b). Both IPA Parts include a review and evaluation of the plan holder's response to the spill as it relates to the general response plan requirements found in 30 CFR §254.5.



Q2. An NRC or other spill report has been sent to BSEE and forwarded to OSPD personnel. What happens next?

A2: A Part-I IPA is only initiated on oil spill reports that meet an internal review threshold. The duty Pollution Preparedness Analyst (PPA) shall use common sense and job related experience to evaluate whether an oil spill notification from a 30 CFR §254 regulated facility should include a Part-I IPA. Notifications that don't require an IPA should be filed in accordance with Section specific policy.

Q3. As the duty PPA, I have decided that a Part-I IPA should be conducted on an oil spill notification. How do I initiate the Part-I IPA?

A3: A part-I IPA may be initiated for any reason by the duty PPA. For example, if an oil spill incident occurred and the PPA has reason to believe that the plan holder was non-compliant with the general response plan requirements as per 30 CFR §254.5. PPAs should complete the IPA datasheet and collect any information necessary to evaluate compliance with notification requirements.

Q4. I completed the IPA and determined that the plan holder was in compliance. Now what?

A4: Determining and documenting compliance is just as important as determining and documenting non-compliance. Remember that the effort level by OSPD personnel is most likely the same regardless of outcome. Therefore, OSPD personnel must account for all IPA related activity and document compliance and non-compliance. If the plan holder is in compliance, use the IPA datasheet to document the regulatory activity and the outcome of the evaluation. Include the documentation supporting your conclusion.

Q5. Why do I have to fill out the IPA datasheet regardless of the compliance outcome?

A5: It is important to document every regulatory activity undertaken by OSPD personnel. This provides valuable resource management data and ensures that every decision made by OSPD is appropriately and consistently documented. For each IPA conducted by OSPD personnel, there should be a corresponding OSPD tracking number. Every enforcement action or OSRP revision that stems from an IPA should have a separate OSPD tracking number, and linkages should be documented.

Q6. I completed an IPA and determined the plan holder was not in compliance. Now what?

A6: If the plan holder failed to comply with notification or reporting requirements for a specific oil spill incident, then an enforcement action should be taken.

Q7. What is an INC enforcement package?

A7: An INC enforcement package is made up of the INC form (BSEE-1832) and the applicable non-compliance record. The non-compliance record template is part of the Enforcement (ENF) SOP and shall be used for all proposed INCs. The non-compliance record is the PPA's way to communicate to the OSPD Chief the facts of the case and why an INC should be issued to the plan holder. It provides documentation, context, and background for your decision regarding non-compliance. The non-compliance record should include the evidence collected in the IPA datasheet. In fact, if the IPA was thoroughly completed, the INC package is nothing more than a cut and paste reorganized version of the IPA results and the INC form.



Please note that the INC form should NOT include the non-compliance narrative. It should simply reference the actual violation and the supporting information report. Here is the example language for a typical Part-I IPA INC package: “Failure to immediately notify the National Response Center. For additional information see attached supporting information”. The INC form should be sent to the plan holder with the supporting information report included as an enclosure or attachment.

Q8. When is a Part-II IPA required?

A8: A Part-II IPA is required anytime a follow-up report is required to be filed with BSEE in accordance with a 30 CFR §254.46(b). The Part-II IPA evaluates compliance with 30 CFR §254.46(b) requirements regarding the written follow up reports required within 15 days following the incident. The Part-II IPA includes a review and evaluation of the plan holder’s response to the spill as it relates to the general response plan requirements found in 30 CFR §254.5.

Q9. As the duty PPA, what if I determine in the Part-II IPA that they did not provide all the required information? What if they did not file the report with BSEE within 15 days after the spillage was stopped?

A9: The PPA should create an INC package for non-compliance with 30 CFR §254.46(b), either for not providing all the required information within the follow-up report or for not filing the follow-up report on time.

Q10. What if during the Part-II IPA, I determine that the response to the spill needs a more detailed analysis?

A10: 30 CFR §254.46(b)(2) gives OSPD the authority to require additional information if it is determined that an analysis of the response is necessary. The PPA should consult with the other members of the Duty Team and the supervisor as necessary to make this determination. The PPA should utilize a standard request for information (RFI) letter that includes the OMB control number. This should all be included in the Part-II IPA. PPAs shall utilize the most recent approved RFI letter within their Section. Due to the unique nature of each RFI, an example document is not provided within these SOPs.

Q11. As the duty PPA, what if I determine that no notification or follow-up report non-compliance exists, but believe that the OSRP should be revised to reflect new information, technologies or other data obtained due to this oil spill incident?

A11: The IPA datasheet can be used to document and then refer or recommend corrective actions, enforcement actions and/or OSRP revisions. If the PPA collects enough information to support a revision to an approved OSRP, the PPA should document that within the IPA and refer the matter to appropriate OSPD personnel to initiate the OSRP required revision process. The required referral actions are unique to each Section.

Q12. As the duty PPA, I just received a spill notification for a 100-barrel oil spill incident from a 30 CFR §254 regulated offshore facility. I already know I will need to do a Part-II IPA as those are required for anything over 1 barrel. If I determine I need to do a Part-I IPA as well, can I use one IPA datasheet to document both Part-I and Part-II IPAs?

A12: Yes. Be aware that there is a temporal aspect for a dual IPA that may necessitate doing a Part-I and Part-II IPA separately per 30 CFR §254.46(b)(2). This means having two unique OSPD tracking



numbers for each IPA Part. However, if a two-part IPA is necessary, the PPA may use one IPA datasheet for the entire IPA.

Q13. Why are IPA's called IPA's and not incident investigations?

A13: OSPD has determined that avoiding confusion with other regulatory programs within BSEE is important. The term IPA also better illustrates exactly what offshore oil spill incident activities OSPD personnel are analyzing and evaluating in order to make better regulatory decisions specific to offshore oil spill planning and preparedness.

Q14. What if there is an oil spill notification and in addition to an IPA being conducted, OSPD personnel are deployed. Are there any specific administrative record keeping requirements for deployed personnel?

A14: Yes. The PPA or PPS shall create an IRC file and OSPD tracking number that documents an oil spill incident deployment. The personnel deployed should provide appropriate documentation for the administrative record. For instance, ICS forms, incident action plans, and other incident specific paperwork related to the technical assistance request. If any regulatory activity stems from this deployment, those records shall be kept in the separate and most appropriate administrative record and corresponding OSPD tracking number.

IRC-2 Frequently Asked Questions:

Q1. How does OSPD provide oil spill incident response support to NRS agencies?

A1: OSPD provides oil spill incident response support to NRS agencies by utilizing a duty team system. The OSPD Duty Team operates on the following principles:

- a. For CA and AK: OSPD personnel are expected to maintain the two primary duty positions year round. These positions are the PPA and the PPS and are encouraged to rotate between personnel at the Section's discretion.
- b. For Gulf Oil Spill Preparedness Section: Two Duty Teams will rotate every thirty days (one calendar month) in order to better distribute the workload across Gulf Oil Spill Preparedness Section OSPD personnel. Each of the teams consists of three duty positions. These positions are the PPA, the PPS and the SO or trainee. Personnel management within the Duty Teams is at the discretion of the Gulf Oil Spill Preparedness Section Chief.
- c. When on duty, these Duty Teams manage their response readiness level. All OSPD personnel located in the Section, assigned to Duty Teams that are on duty remain at a level-3 response readiness level (see Table 4-7 for more information). The response readiness level shall remain at 3 until OSPD duty personnel are requested to provide technical assistance or determine that technical assistance is required. This is also true for the Trusted Agent Program.
- d. When requested or when OSPD personnel recognize that a situation may require greater situational awareness, the readiness level should be changed to level 2 and the appropriate OSPD supervisor shall be notified. Once the readiness level is changed, a reassessment of this readiness level must occur every 12 hours. The supervisor or OSPD senior staff may waive this update requirement.



- e. Anytime OSPD personnel are deployed, the readiness level shall change to level 1. This signifies the maximum readiness state for OSPD and all personnel within a Section at readiness level 1 should expect to support deployed personnel as necessary.
- f. OSPD personnel shall not be granted compensatory time, over time or other off-hours benefits unless the response readiness level has been changed and the appropriate OSPD supervisor concurs with the change.
- g. At response readiness level 1 or 2, OSPD personnel should be prepared to provide IPA regulatory activities, technical assistance and/or act as the Trusted Agent. The Duty Teams deploy and provide oil spill incident response support to an incident command or the applicable FOSC. See Table 4-8 for additional information on which duty positions would provide individual oil spill incident response support when deployed.
- h. The Duty Team, or most appropriate Duty Team position, must create an IRC file for any oil spill incident response support that decreases the response readiness level. See the supporting information management protocols on how to build an administrative record for the IRC SOPs.

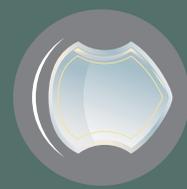
Q2. Why does the Trusted Agent Program exist and how is it different from providing Technical Assistance to NRS agencies?

A2: The Trusted Agent Program exists to provide liaison-like assistance between BSEE personnel in other offices and the USCG during incidents or situations where OSPD does not have clear jurisdiction and authority. The Trusted Agent Program exists at the request of BSEE personnel in other offices who need assistance providing the USCG and other NRS agencies the information they request during an offshore incident. Typically, the information flow doesn't need to be interpreted by OSPD personnel, rather OSPD is a way for outside agencies to obtain information from non-OSPD BSEE personnel. See *Part II: Trusted Agent Program* above for additional information on the Trusted Agent Program.

Q3. What ICS role should I play when deployed to an ICP or on-site command post?

A3: There are specific ICS positions that OSPD is most appropriate to fill when assigned to an ICP. See Table 4-8 for more information on these ICS positions. OSPD personnel may not serve in any other ICS position unless approved by the OSPD Chief or Preparedness Verification Branch Chief.

Regulatory Activity Matrix with Intradepartmental Accountability



Incident Response and Regulatory Activity Matrix					
Regulatory Activity and/or Incident Response Actions	IRC SOP	Required OSPD Actions	Minimum OSPD Staff*	Potential Documents and Forms	Briefing Thresholds and Requirements
<p>30 CFR §254.5 General response plan requirements.</p> <p><i>(a) The response plan must provide for response to an oil spill from the facility. You must immediately carry out the provisions of the plan whenever there is a release of oil from the facility. You must carry out the training, equipment testing, and periodic drills described in the plan, and these measures must be sufficient to ensure the safety of the facility and to mitigate or prevent a discharge or a substantial threat of discharge.</i></p> <p><i>(b) The plan must be consistent with the National Contingency Plan and the appropriate Area Contingency Plan(s).</i></p> <p><i>(c) Nothing in this part release you from taking all appropriate actions necessary to immediately abate the source of a spill and remove any spills of oil.</i></p> <p><i>(d) In addition to the requirements listed in this part, you must provide any other information the OSRD Chief requires for compliance with appropriate laws and regulations.</i></p>	<p>IRC-1: Offshore Facility Spill Notification</p>	<p>Review spill/pollution reports daily from any/all sources. If a spill occurs evaluate the O/O's response against the following general response plan requirements:</p> <ul style="list-style-type: none"> • Did the O/O's immediately carry out the provisions of the OSRP when a discharge occurred from a facility? • Did the O/O carry out the training, equipment testing and periodic drills described in the plan? • Were all the above measures sufficient to ensure facility safety and mitigate or prevent an oil discharge or substantial threat of an oil discharge? • Is the plan consistent with the NCP and appropriate ACP? • Did the O/O take all appropriate actions necessary to remove any oil spills? • Did the O/O provide any other information the OSPD Chief needed to determine compliance with appropriate laws and regulations? 	<p>Office: Analyst (1)</p> <p>Field Deployed: Analyst(1) PPA/PPS/SO-T (1)</p>	<p>ICS-214 NRC reports CG Pollution Reports</p>	<p>201 brief Resource Request Incident critical developments Deviation from OSRP Media Interest BP Owned/Operated USCG response</p>
		<p>30 CFR §254.46 Whom do I notify if an oil spill occurs?</p> <p><i>(a) You must immediately notify the National Response Center (1-800-424-8802) if you observe:</i></p> <ol style="list-style-type: none"> <i>(1) An oil spill from your facility</i> <i>(2) An oil spill from another offshore facility</i> <i>(3) An offshore spill of unknown origin</i> 	<ul style="list-style-type: none"> • Review spill/pollution reports daily from any/all sources • Follow-up phone calls on all spill reports • Determine if USCG initiated pollution investigation • Obtain pictures or other evidence related to discharge • Chart or map the spill/sheen report • Coordinate with Regional Supervisor/Field Office for consistent investigation • Complete Spill Report Disposition Form 		



<p>(b) In the event of a spill of one barrel or more from your facility, you must orally notify the Regional Supervisor without delay. You also must report spills from your facility of unknown size but thought to be one barrel or more.</p> <p>(1) If a spill from your facility not originally reported to the Regional Supervisor is subsequently found to be one barrel or more, you must then report it without delay.</p> <p>(2) You must file a written follow-up report for any spill from your facility of one barrel or more. The Regional Supervisor must receive this confirmation within 15 days after the spillage has been stopped. All reports must include the cause, location, volume, and remedial action taken. Reports of spills of more than 50 barrels must include information on the sea state, meteorological conditions, and the size and appearance of the slick. The Regional Supervisor may require additional information if it is determined that an analysis of the response is necessary.</p>		<p>Review spill/pollution reports daily from any/all sources. If a spill occurs, evaluate the O/O's reporting actions against the following reporting requirements:</p> <ul style="list-style-type: none"> • Verify that spills over one barrel were reported to the Regional Supervisor • Ensure that spills reported as unknown in quantity are updated to reflect most accurate amount, given evidence • Initiate field/follow-up investigation (FFI) • Coordinate FFI with RS/FO engineers and inspectors • Coordinate with USCG Pollution Investigators to update NRC reports or USCG MISLE-database information • Ensure that O/O provides report on spill of one barrel or more within 15 days after spillage has stopped • Ensure that the required information was reported regarding spills of one barrel or more • Ensure that the required information was reported regarding spills of 50 barrels or more • Detail reported cause in FFI and file report as required within applicable OSRP file • All spills, spill reports, and cause analysis offered by an O/O from a particular facility shall be evaluated against all other spills from that facility to determine potential patterns of noncompliance 	<p>Office: Analyst (1) SO/T (1)</p> <p>Field Deployed: PPA (1) PPS (1)</p> <p>Field Support: SO-T (1)</p> <p>*Minimum staffing shall not be met with unqualified personnel-in-training</p>	<p>ICS-214 NRC reports Witness statement Request for Information letter IPA Datasheet Enforcement SOP</p>	<p>201 brief Resource Request Incident critical developments Deviation from OSRP Media Interest BP Owned/Operated USCG response</p>
<p>(c) If you observe a spill resulting from operations at another offshore facility, you must immediately notify the responsible party and the Regional Supervisor.</p> <p>40 CFR §300.175(a): During preparedness planning or in an actual response, various federal agencies may be called upon to provide assistance in their respective areas of expertise, as indicated in paragraph (b) of this section, consistent with agency legal authorities and capabilities.</p> <p>40 CFR §300.175(b)(9)(v): Minerals Management Service [BSEE]: Oversight of offshore oil and gas exploration and production facilities under the Outer Continental Shelf Lands Act and the CWA; oil spill response technology research; and establishing oil discharge contingency planning requirements for offshore facilities.</p>	<p>IRC-2: Technical Assistance & Trusted Agent</p>	<ul style="list-style-type: none"> • See actions for 30 CFR §254.5 and §254.46(a) above, and Every attempt shall be made to establish a responsible party for spills reported as "unknown source" • Maintain connectivity to active spill responses involving offshore facilities, develop common operational picture • Initiate Incident Preparedness Assessment (IPA), concurrently ensure OSPD is ready to deploy ICP assistance as necessary • If requested or ordered, deploy to an incident's command post, and assume most appropriate ICS position • ICS-214 forms shall be utilized to document actions taken while deployed as an OSPD representative • The preparedness assistance team shall be utilized whenever OSPD personnel are deployed • Complete full IPA, incorporating all aspects of the spill notification, response, removal, and follow-up 	<p>See 30 CFR §254.46(a)</p> <p>ICP Deployed: Analyst (1) Specialist (1)</p> <p>ICP Support: A/S (1)</p> <p>Active Spill: Analyst (1) Specialist (1) SO-T (1)</p>	<p>See above</p> <p>See above</p> <p>ICS-214 Trip report</p>	<p>See above</p> <p>When deployed: Daily activity updates</p>



Any other Government agency requests assistance		<ul style="list-style-type: none"> If request approved by OSPD Chief, then initiate actions listed for IRC-2 above, as necessary 	OSPD Chief Consult	ICS-214 Trip report	OSPD Chief approval
<p>In addition to job tasking above, and if your office functions are relocated under continuity of operations (COOP) requirements, additional personnel accountability actions shall occur during an incident or natural disaster that disrupts normal OSPD working conditions and/or environment.</p>	COOP Requirements	<ul style="list-style-type: none"> Each OSPD member shall report to his or her respective division group/supervisor at least once every 24 hours, or as directed The appropriate OSPD supervisor shall report personnel accountability to the OSPD Chief, at least once every 24 hours, or as directed 	All personnel	ICS-214	Any disruption of normal workplace environment

Table 4-10. Incident response regulatory activity matrix for IRC-1 and IRC-2 SOPs.



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Incident Response and Notification Capability: Appendix Reference

Appendix A Acronym List	A2
Appendix B Definitions	B5
Appendix CC Incident Preparedness Analysis Data Sheet.....	CC 13
Appendix DD IRC Control Sheet.....	DD 15



Photo Credit: NOAA's Office of Response and Restoration



Section 5 - Preparedness Coordination Capability (PCC)



Introduction

Preparedness coordination is an essential aspect to ensuring the success of a consistent national oil spill response preparedness program. Additionally, the Bureau of Safety and Environmental Enforcement (BSEE) is an essential component to the National Response System (NRS) as promulgated by the National Oil and Hazardous Substances Pollution Contingency Plan (NCP). Refer to the Incident Response and Notification Capability (IRC) for specific NRS responsibilities for Oil Spill Preparedness Division (OSPD) personnel. The activity of preparedness coordination as it relates to regulatory activities under 30 CFR §254 is inextricably linked to the concept of preparedness for disasters or other emergencies. This document has been organized utilizing the principles from the Federal Emergency Management Agency's (FEMA's) National Preparedness Goal:

A secure and resilient nation with the capabilities required across the whole community to prevent, protect against, mitigate, respond to, and recover from the threats and hazards that pose the greatest risk.

OSPD is concerned with the ability of offshore facility owners/operators (O/O) to respond to their worst case oil discharge to the maximum extent practicable. OSPD provides a service to the Nation by ensuring that the O/O's preparedness level meets regulatory requirements. OSPD does this by organizing their regulatory authority into five core capabilities that are used to reach capability targets that ensure compliance verification for the regulated community.

While OSPD is solely responsible for ensuring that offshore facilities are meeting their preparedness requirements, those efforts are not accomplished in a vacuum. A broad interagency coordination effort must be concurrently maintained in order to ensure maximum preparedness by the regulated community. This also means that OSPD itself must be able to provide appropriate oversight to oil spill response preparedness operations. This includes all of the regulatory activities found within OSPD's five core capabilities. Therefore, a broad spectrum of outreach, coordination, and support of subcommittees and task forces by OSPD personnel is necessary to provide for maximum regulatory compliance for all offshore facilities. This outreach is organized and is done under the purview of the NCP's promulgation of the NRS.

This capability provides a basic roadmap for why and how OSPD will accomplish planning and preparedness activities primarily detailed within 40 CFR §300 Subpart C. Combined with principles from the field of emergency management, FEMA, and other preparedness experts, this capability seeks to ensure that OSPD personnel are fully engaged and coordinating activities with stakeholders, external agencies, committees, and other groups as required by law or as directed by the OSPD Chief.

The Planning and Preparedness Paradigm

In the post Deepwater Horizon regulatory environment, the importance of consistent planning and preparedness coordination cannot be overstated. As detailed below, the NCP via the NRS sets forth a robust and multilayered planning and preparedness organization that requires renewed and sustained focus by every person assigned to OSPD. Further, it is only through interagency coordination via the NRS that OSPD personnel can be assured that when an oil spill occurs from



an offshore facility, the O/O and the contracted oil spill removal organizations are able to actually do what their plans say they can do. While OSPD is singularly responsible for ensuring compliance with 30 CFR §254 by offshore facilities, once an oil spill occurs, the NRS response mechanisms are initiated and OSPD will find itself working side by side with all of the NCP identified Federal, State, local, tribal, and industry stakeholders. There will be an expectation, both internally and externally, by the NRS that everyone will understand and fill their role. OSPD's success within the confines of the NRS is directly proportional to its engagement within the NCP's planning and preparedness for oil and hazardous substance responses. OSPD also helps ensure other NRS agencies are prepared to fulfill their roles by providing information and expertise. For example, facility and worst case discharge scenario information is regularly provided to Area Committees.

To be clear, the notion of planning and preparedness for disaster response is not a new one. State and local responders, private sector and industry, with support from FEMA have created and maintain a skilled cadre of professional emergency managers and responders. Furthermore, emergency managers have a great deal to teach OSPD as it establishes itself as a critical member of NRS planning and preparedness.

In *Disaster Response: Principles of Preparation and Coordination*, considered by emergency managers as the quintessential handbook on disaster response based on its utility and thoroughly researched scientific references, Dr. Eric Auf der Heide identifies principles regarding disaster preparation. The principles most pertinent to NRS planning and preparedness activities are quoted here, with bold-type emphasis added:

For disaster planning to be effective, it must be inter-organizational. The typical response to a disaster includes multiple independent organizations from the private sector as well as from agencies of city, county, state, federal, and special district governments. Often, they have planned independently and end up responding that way, with little grasp of how each fits into the overall response. **When planning has been done on an inter-organizational basis, it is more likely to result in a coordinated response.**

The process of planning is more important than the written document that results. One aspect of disaster planning often overlooked is the importance of the process. Often it is more important than the written document that results. One reason for this is that those who participate in developing the plan are more likely to accept it. This is preferred over adopting a plan written by someone else who may not understand local circumstances. But, there is another aspect of equal importance—the personal contacts that develop. A number of researchers have observed that pre-disaster contacts among representatives of emergency organizations result in smoother operations in subsequent disasters. Organizations are more likely to interface if the contact is not with total strangers. Furthermore, in the process of planning, the participants become familiar with the roles of other individuals and organizations involved in the disaster response.

In disasters, what are thought to be 'communications problems' are often coordination problems in disguise. One key to understanding disaster communication problems is the concept of pre-incident communications. In efficient routine emergency operations, the vast majority of communications have occurred prior to the incident. The goals and tasks are often determined by tradition. They are formalized in statutes, contracts,



and charters. Within various organizations, they are addressed in rules, regulations, performance standards, and standard operating procedures. The important point here is that many of these tasks are known beforehand and do not have to be communicated for each event to which an organization responds. Yet, a number of observations in disasters have revealed a lack of pre-impact communications among key local disaster response organizations such as law enforcement agencies, fire departments, local emergency management agencies, and organizations in the health and welfare sectors. This may be compounded by the fact that organizations responding to disasters often include many who have had minimal previous contact, because they do not respond to local emergencies on a routine basis. When organizations have interacted and coordinated with each other beforehand, they have had fewer problems doing so in a disaster.

Those who work together well on a daily basis tend to work together well in disasters.

Even under the pressure of a disaster, certain preliminary information has to be exchanged before meaningful communication and coordination can take place with a member of an unfamiliar organization. Examples of the types of critical information needed include: what the organization's legitimate role is in the disaster response; whether that person has a legitimate position in that organization; and the competence and reliability of that person.

Emergency organizations with disaster operations responsibility frequently hesitate to coordinate with others unless these questions have been addressed. *This hesitancy may exist even though there are formal plans or arrangements for the different organizations to coordinate.* Unfortunately, the urgency of the disaster situation often precludes the time necessary to determine the answers to these questions on-the-spot. The result is that, unless they have been addressed *before the disaster*, there is a reluctance to depend on the activities of other organizations and a failure to coordinate and communicate with them. When one is dependent on other team members, particularly in life-threatening situations, he needs to feel confident in their competence and reliability. Developing this level of trust often requires "pre-incident" contact over a period of time.

Even though planning and preparedness activities for oil and chemical spills fall under the NCP, the basic principles of preparation and coordination apply to NRS planning and preparedness activities. As OSPD personnel integrate more fully within the NRS, they should recognize that there are multiple opportunities for coordinated planning at various levels of Government.

Background

40 CFR §300 promulgates the NRS, which facilitates an ability for effective national response to oil discharges, releases of hazardous substances, and/or pollutants and contaminants whether accidental or deliberate. The NRS provides a framework for coordination among Federal, state, and local responders and responsible parties to respond effectively to the kinds of discharges and releases just described and include four levels of contingency planning (Federal, regional, area, and local and site-specific industry) that guide response efforts. NRS coordinated planning and preparedness is no small effort; it requires integrating elements of a host of Federal and state statutes and implementing regulations with disparate purposes.



For instance, there is little or no connectivity between the Environmental Protection Agency, the U.S. Coast Guard, and OSPD with regard to the regulatory management of facility plans for oil spills that are drafted and maintained by industry. Each agency handles their plans differently because each of their regulations are written for an industry that operates in specific geographic zones within the United States. This works very well, as regulatory management of plans is handled by the appropriate oversight agency and ensures national consistency. What is unique is that each facility oil spill plan is interconnected within the NCP via the NRS as it relates to planning for a response and an actual response to an oil discharge or a release to the environment of a hazardous substance, pollutant, or contaminant. For OSPD personnel resource commitment purposes, these standard operating procedures (SOP) promulgate a consistent and permanent presence within the NRS planning and preparedness bodies.

Regulatory Applicability

The NCP via the NRS has set forth a thorough planning and preparedness system that OSPD must stay connected to, to the greatest extent possible. Below is an excerpt from the NCP describing the planning and preparedness system within the NRS.



Subpart C—Planning and Preparedness

§300.200 General

This subpart summarizes emergency preparedness activities relating to discharges of oil and releases of hazardous substances, pollutants, or contaminants; describes the three levels of contingency planning under the national response system; and cross-references state and local emergency preparedness activities under SARA Title III, also known as the “Emergency Planning and Community Right-to-Know Act of 1986” but referred to herein as “Title III.” Regulations implementing Title III are codified at 40 CFR subchapter J.

§300.205 Planning and coordination structure

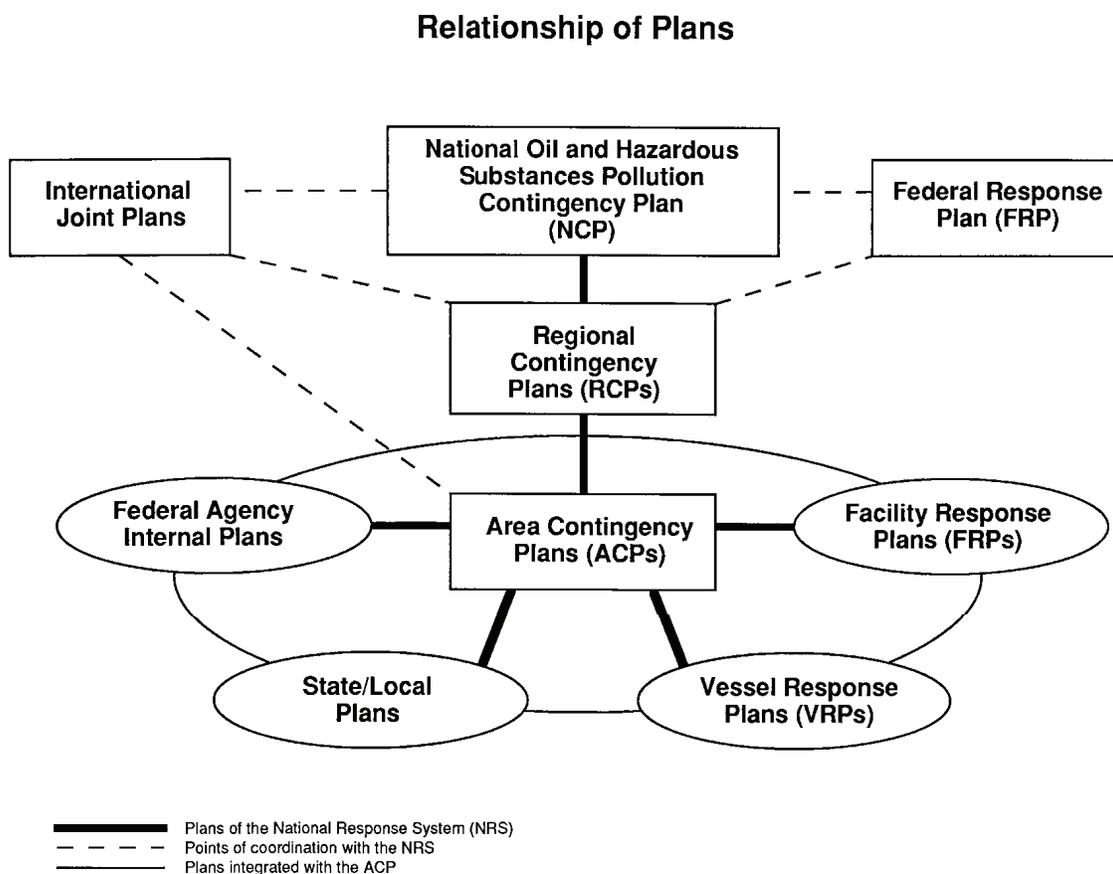
- (a) *National. As described in §300.110, the NRT is responsible for national planning and coordination.*
- (b) *Regional. As described in §300.115, the RRTs are responsible for regional planning and coordination.*
- (c) *Area. As required by section 311(j) of the CWA, under the direction of the federal OSC for its area, Area Committees comprising qualified personnel of federal, state, and local agencies shall be responsible for: (1) Preparing an ACP for their areas (as described in § 300.210(c)); (2) Working with appropriate federal, state, and local officials to enhance the contingency planning of those officials and to assure pre-planning of joint response efforts, including appropriate procedures for mechanical recovery, dispersal, shoreline cleanup, protection of sensitive environmental areas, and protection, rescue, and rehabilitation of fisheries and wildlife; and (3) Working with appropriate federal, state, and local officials to expedite decisions for the use of dispersants and other mitigating substances and devices.*
- (d) *State. As provided by sections 301 and 303 of Title III, the SERC of each state, appointed by the Governor, is to designate emergency planning districts, appoint Local Emergency Planning Committees (LEPCs), supervise and coordinate their activities, and review local emergency response plans, which are described in § 300.215. The SERC also is to establish procedures for receiving and processing requests from the public for information generated by Title III reporting requirements and to designate an official to serve as coordinator for information.*
- (e) *Local. As provided by sections 301 and 303 of Title III, emergency planning districts are designated by the SERC in order to facilitate the preparation and implementation of emergency plans. Each LEPC is to prepare a local emergency response plan for the emergency planning district and establish procedures for receiving and processing requests from the public for information generated by Title III reporting requirements. The LEPC is to appoint a chair and establish rules for the LEPC. The LEPC is to designate an official to serve as coordinator for information and designate in its plan a community emergency coordinator.*
- (f) *As required by section 311(j)(5) of the CWA, a tank vessel, as defined under section 2101 of title 46, U.S. Code, an offshore facility, and an onshore facility that, because of its location, could reasonably be expected to cause substantial harm to the environment by discharging into or on the navigable waters, adjoining shorelines, or exclusive economic zone must prepare and submit a plan for responding, to the maximum extent practicable, to a worst case discharge, and to a substantial threat of such a discharge, of oil or a hazardous substance.*
- (g) *The relationship of these plans is described in Figure 4.*



40 CFR §300.205(g) makes reference to the relationship of the plans described within 40 CFR §300 Subpart C. That relationship is reproduced below as Figure 1. Subpart C clearly works to connect and functionally link the various planning bodies and their preparedness work at all levels of Government: national, regional, area, local and site specific. It is the connectivity to this system that will ensure overall success of OSPD’s regulatory mission in the event that a discharge of oil from an offshore facility actually occurs.

While not specifically identified within the NRS, for purposes of the OSPD Manual, an oil spill response plan (OSRP) is treated as a facility response plan (FRP) as identified in Figure 1. The connectivity for OSRPs would also mirror that of the FRPs as shown. This is consistent with the external agency review required for OSRPs under ORC-2, which requires review and comment in context with the applicable Area Contingency Plan (ACP) via the Area Committee.

Figure 5-1. Relationship of NRS Plans





OSPD Involvement in NRS Planning and Preparedness

As stated previously, the Preparedness Coordination Capability (PCC) SOP internally promulgates a nationally consistent OSPD presence within each level of NRS planning and preparedness. Given the importance of active and consistent participation within all levels of planning and preparedness and the limited personnel and resources of OSPD, commitment levels for OSPD personnel have been developed. Table 5-1 and 5-2 work together to provide a clear understanding of OSPD’s personnel resource commitment to each planning and preparedness body by providing a one-word description that clearly represents the associated level of OSPD involvement. The levels of involvement are major, medium, and minor (see Table 5-1) and allow the OSPD Chief to assist the OSPD supervisors in better management of their personnel resources for interagency NRS planning and preparedness activities.

Commitment Descriptor Level	Commitment Descriptor Level Defined
Major	Every meeting must be attended; personnel shall participate in taskforces, and subcommittees as part of their OSPD duties. OSPD personnel should be ready to provide consistent and routine OSPD operational briefs appropriate to the governing level of the planning and preparedness body. OSPD personnel shall strive to maintain regular connections with other attendees. Recommend that two people are assigned to ensure regular and consistent attendance at all times. Meetings attended and participated by OSPD HQ personnel, should communicate relevant information to the appropriate OSPD supervisor as necessary within two working days of every meeting. Trip reports to the OSPD Chief via the OSPD supervisor are required within 2 working days of every meeting.
Medium	Attend at least one meeting per year and personnel may be rotated through, as consistency is not an issue with this planning and preparedness body. OSPD personnel should be ready to provide OSPD operational briefs as requested. OSPD personnel shall maintain specific relationships with other attendees as previously identified by the appropriate OSPD supervisor. Meetings attended and participated by OSPD HQ personnel, should communicate relevant information to the OSPD supervisor as necessary within two working days of every meeting. Trip reports to the OSPD Chief via the OSPD supervisor are required within 2 working days of every meeting.
Minor	Attend meetings as necessary or as directed. OSPD operational briefs will be provided as required. Trip reports to the OSPD Chief via the OSPD supervisor will be required on a case by case basis.

Table 5-1. OSPD Personnel Commitment Levels



OSPD's Role in NRS Planning and Preparedness Activities	
40 CFR §300 Regulatory Cites with Additional Information	OSPD Commitment Level
<p>§ 300.105 General organization concepts</p> <p>(a) Federal agencies should: (1) Plan for emergencies and develop procedures for addressing oil discharges and releases of hazardous substances, pollutants, or contaminants; (2) Coordinate their planning, preparedness, and response activities with one another; (3) Coordinate their planning, preparedness, and response activities with affected states, local governments, and private entities; and (4) Make available those facilities or resources that may be useful in a response situation, consistent with agency authorities and capabilities.</p> <p>(b) Three fundamental kinds of activities are performed pursuant to the NCP: (1) Preparedness planning and coordination for response to a discharge of oil or release of a hazardous substance, pollutant, or contaminant; (2) Notification and communications; and (3) Response operations at the scene of a discharge or release.</p>	<p>All OSPD: Major</p> <p>Note: Adherence to OSPD Manual satisfies this requirement</p>
<p>§ 300.110 National Response Team</p> <p>National planning and coordination is accomplished through the NRT.</p> <p>Description: The National Response Team (NRT) is comprised of representatives of 15 federal agencies, each with responsibilities and expertise in various aspects of emergency response to oil and hazardous substance pollution incidents. The NRT has nationwide responsibilities for interagency planning, policy, and coordination for pollution incidents of all sizes and kinds. The NRT meets regularly and provides policy guidance and assistance. The NRT may be activated during an incident, if needed, to provide national-level advice and assistance, as well as access to member agency resources that could not be provided at the Regional Response Team (RRT) level. The NRT also closely coordinates closely with the Interagency Coordinating Committee on Oil Pollution Research and National Schedule Coordination Committee.</p>	<p>HQ: Major</p> <p>Sections: Minor</p>
<p>§ 300.115 Regional Response Teams</p> <p>(a) Regional planning and coordination of preparedness and response actions is accomplished through the RRT. In the case of a discharge of oil, preparedness activities will be carried out in conjunction with Area Committees, as appropriate. The RRT agency membership parallels that of the NRT, as described in § 300.110, but also includes state and local representation.</p> <p>Description: The Regional Response Teams (RRT) ensures that the multi-agency resources and expertise of the NRS are available to support the FOSC as needed during a pollution incident. There are 13 RRTs, one for each of the ten EPA federal regions, plus one for Alaska, one for the Caribbean, and one for Oceania. The RRTs are comprised of representatives from the 15 federal NRS member agencies, plus state representatives, and are co-chaired by the EPA and USCG.</p>	<p>HQ: Medium</p> <p>Sections: Major</p>



OSPD's Role in NRS Planning and Preparedness Activities	
40 CFR §300 Regulatory Cites with Additional Information	OSPD Commitment Level
<p>§300.210 Federal contingency plans</p> <p><i>There are three levels of contingency plans under the national response system: The National Contingency Plan, RCPs, and ACPs. These plans are available for inspection at EPA regional offices or USCG district offices.</i></p> <p>(a) <i>The National Contingency Plan. The purpose and objectives, authority, and scope of the NCP are described in §300.1 through 300.3.</i></p> <p>(b) <i>Regional Contingency Plans. The RRTs, working with the states, shall develop federal RCPs for each standard federal region, Alaska, Oceania in the Pacific, and the Caribbean to coordinate timely, effective response by various federal agencies and other organizations to discharges of oil or releases of hazardous substances, pollutants, or contaminants. RCPs shall, as appropriate, include information on all useful facilities and resources in the region, from government, commercial, academic, and other sources. To the greatest extent possible, RCPs shall follow the format of the NCP and be coordinated with state emergency response plans, ACPs, which are described in §300.210(c), and Title III local emergency response plans, which are described in §300.215. Such coordination should be accomplished by working with the SERCs in the region covered by the RCP. RCPs shall contain lines of demarcation between the inland and coastal zones, as mutually agreed upon by USCG and EPA.</i></p> <p>(c) <i>Area Contingency Plans. (1) Under the direction of an [On-Scene Coordinator (OSC)] and subject to approval by the lead agency, each Area Committee, in consultation with the appropriate RRTs, [USCG District Response Groups (DRGs)], the [National Strike Force Coordination Center (NSFCC)], [Scientific Support Coordinators (SSCs)], LEPCs, and [State Emergency Response Commissions (SERCs)], shall develop an ACP for its designated area. This plan, when implemented in conjunction with other provisions of the NCP, shall be adequate to remove a worst case discharge under §300.324, and to mitigate or prevent a substantial threat of such a discharge, from a vessel, offshore facility, or onshore facility operating in or near the area.</i></p> <p><i>(2) The areas of responsibility may include several Title III local planning districts, or parts of such districts. In developing the ACP, the OSC shall coordinate with affected SERCs and LEPCs. The ACP shall provide for a well-coordinated response that is integrated and compatible, to the greatest extent possible, with all appropriate response plans of state, local, and nonfederal entities, and especially with Title III local emergency response plans.</i></p>	<p>For Area Contingency Planning Committees:</p> <p>HQ: Minor</p> <p>Sections: Major</p>



OSPD's Role in NRS Planning and Preparedness Activities	
40 CFR §300 Regulatory Cites with Additional Information	OSPD Commitment Level
<p>§ 300.215 Title III local emergency response plans <i>This section describes and cross-references the regulations that implement Title III. These regulations are codified at 40 CFR part 355.</i></p> <p>(a) <i>Each LEPC is to prepare an emergency response plan in accordance with section 303 of Title III and review the plan once a year, or more frequently as changed circumstances in the community or at any facility may require. Such Title III local emergency response plans should be closely coordinated with applicable federal ACPs and state emergency response plans.</i></p>	<p>For SERCs/ LEPCs:</p> <p>HQ: Minor</p> <p>Sections: Minor</p>

Table 5-2. OSPD Commitment Levels for NRS Planning and Preparedness

Policy Adapted From Auf Der Heide, Erik. 1989. Disaster Response: Principles of Preparation and Coordination. 1st ed. C.V. Mosby Company.



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Preparedness Coordination Capability (PCC): Appendix Reference

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Section 6 - Standard Operating Procedure (SOP) for Enforcement



OSPD will issue Incidents of Non-compliance (INCs) utilizing currently existing INC forms and processes. The Preparedness Analyst who identifies the non-compliance will prepare an INC and a non-compliance record with supporting information documenting the circumstances of non-compliance for review by a Senior Preparedness Analyst. The non-compliance record should include detailed information pertinent to each instance of regulatory non-compliance. The Senior Preparedness Analyst will review the INC and non-compliance record for completeness and accuracy and then forward to the Section Supervisor or Preparedness Verification Branch Chief, as appropriate, who will indicate concurrence or non-concurrence with issuing the INC by signing the non-compliance record. The Senior Preparedness Analyst will then sign and issue the INC and file the INC and the supporting non-compliance record along with the ENF Control Sheet in the appropriate docket file.

(Note: This process may be altered as necessary due to pending organizational changes.)

Standard Operating Procedure (SOP) for Enforcement: Appendix Reference

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Appendix A: Acronym List

List of Acronyms	
AAR	After Action Report
AAR/IP	After Action Report/Improvement Plan
ACP	Area Contingency Plan
APD	Application for Permit to Drill
ASTM	American Society for Testing and Materials
BOEM	Bureau of Ocean Energy Management
BOEMRE	Bureau of Ocean Energy Management, Regulation and Enforcement
BSEE	Bureau of Safety and Environmental Enforcement
C/E	Controller and Evaluator
CFR	Code of Federal Regulations
COP	Common Operational Picture
DOCD	Development Operations Coordination Document
DOI	U.S. Department of the Interior
DWH	Deepwater Horizon
EDRC	Effective Daily Recovery Capacity
EED	Environmental Enforcement Division
EEG	Exercise Evaluation Guide
EP	Exploration Plan
EPA	Environmental Protection Agency
ENF	Enforcement
EVC	Equipment Verification Capability
FEMA	Federal Emergency Management Agency
FO	Field Operations
FOIA	Freedom of Information Act
FOSC	Federal On-Scene Coordinator
FOUO	For Official Use Only
FPM	Final Planning Meeting
FWPCA	Federal Water Pollution Control Act
GIUE	Government-Initiated Unannounced Exercise
GOM	Gulf of Mexico
HSEEP	Homeland Security Exercise and Evaluation Program
HSPD	Homeland Security Presidential Directive
HSRO	Hazardous Substance Response Organization

ICP	Incident Command Post
ICS	Incident Command System
IMT	Incident Management Team
INC	Incident of Noncompliance
IPM	Initial Planning Meeting
IRU	Investigations and Review Unit
JSA	Job Safety Analysis
MMS	Minerals Management Service
MPM	Mid-term Planning Meeting
MSEL	Master Scenario Events List
MTR	Marine Transportation–Related
NCP	National Oil and Hazardous Substances Pollution Contingency Plan (usually referred to as the National Contingency Plan)
NEP	National Exercise Program
NEPA	National Environmental Policy Act
NEXS	National Exercise Schedule
NIMS	National Incident Management System
NOSC	National Commission of the BP Deepwater Horizon: Oil Spill and Offshore Drilling
NPREP	National Preparedness for Response Exercise Program
NRC	National Response Center
NRF	National Response Framework
NRS	National Response System
NRT	National Response Team
NSC/HSC	National Security Council/Homeland Security Council
NTL	Notice to Lessees and Operators
O/O	Owner/Operator
OCS	Outer Continental Shelf
OCSLA	Outer Continental Shelf Lands Act
OGA	Other Government agency
OIG	Office of Inspector General
OPA	Oil Pollution Act of 1990
OSC	On-Scene Coordinator
OSFR	Oil Spill Financial Responsibility
OSPD	Oil Spill Preparedness Division
OSRO	Oil Spill Removal Organization

OSRP	Oil Spill Response Plan
PHMSA	Pipeline and Hazardous Materials Safety Administration
PINC	Potential Incident of Noncompliance
POC	Points of Contact
QA/QC	Quality Assurance/Quality Control
QI	Qualified Individual
RP	Responsible Party
RPTA	Response Personnel Training Audit
RRT	Regional Response Team
RS	Regional Supervisor
SME	Subject Matter Expert
SMT/SRMT	Spill Management Team Spill Response Management Team
SOP	Standard Operating Procedure
SROT	Spill Response Operating Team
TCL	Target Capabilities List
TEC	Training and Exercise Compliance Capability
TIMS	Technical Information Management System
TSD	Temporary Storage Devices
TTX	Tabletop Exercises
UC	Unified Command
USCG	U.S. Coast Guard
UTL	Universal Task List
VOCs	Volatile Organic Compounds
WCD	Worst Case Discharge

Appendix B: Definitions

The following defined terms are those that originated from several sources, including, but not limited to, 30 CFR §254, HSEEP, and NPREP. Some definitions have been updated and modified to incorporate OSPD regulatory activities. Those terms that have updated or modified from their original document have not been substantively changed and are identified with an asterisk.

After-Action Meeting: As soon as possible after completion of the draft After-Action Report (AAR), the lead evaluator, members of the evaluation team, and other members of the exercise planning team should conduct an After-Action Meeting to present, discuss, and refine the draft AAR, and to develop an Improvement Plan (IP). This meeting is a chance to present the AAR to participating entities in order to solicit feedback and make necessary changes. A list of corrective actions should be generated, identifying what will be done to address the recommendations, who (what agency or person) is responsible, and the timeframe for implementation.

After-Action Report/Improvement Plan: The main product of the evaluation and improvement planning process is the AAR/IP. The AAR/IP has two components—an AAR, which captures observations of an exercise and makes recommendations for post-GIUE improvements, and an IP, which identifies specific corrective actions and, if necessary, initiates compliance enforcement. The lead evaluator and the exercise planning team draft the AAR and submit it to meeting participants prior to the After-Action Meeting. The draft AAR is completed first and distributed to meeting participants for review no more than 30 days after the exercise is conducted. The final AAR/IP is an outcome of the After-Action Meeting and should be disseminated to participants no more than 60 days after the exercise is conducted. Even though the AAR and IP are developed through different processes and perform distinct functions, the final AAR and IP should always be printed and distributed jointly as a single AAR/IP following an exercise.

Area: That geographic area for which a separate and distinct ACP has been prepared, as described in the OPA 90. For EPA areas with subarea plans or annexes to the ACP, the EPA Regional Administrator shall decide which subarea plan is to be exercised within the triennial cycle.

Area Committee: Area Committees are those committees comprised of Federal, state and local officials, formed in accordance with section 4202 of the OPA 90, whose task is to prepare an ACP for the area for response to a discharge of oil or hazardous substance.

Area Spill Management Team: The Area Spill Management Team is the group of individuals within the Coast Guard or EPA On-Scene Coordinator organization with responsibility for spill response management within the respective area. The Area Spill Management Team should include state and local personnel whenever possible.

Capabilities-Based Planning: Capabilities-based planning is defined as planning, under uncertainty, to build capabilities suitable for a wide range of threats and hazards while working within an economic framework that necessitates prioritization and choice. Capabilities-based planning is the basis for guidance such as the *National Preparedness Goal*.

Capability: A capability may be delivered with any combination of properly planned, organized, equipped, trained, and exercised personnel to achieve an intended target.

Certification: Certification is the act of confirming that an exercise (1) was completed; (2) was conducted in accordance with the PREP guidelines, meeting all objectives listed; and (3) was evaluated using a mechanism that appraised the effectiveness of the response or contingency plan.

Complex: A complex is a facility regulated under section 311 (j) of the Federal Water Pollution Control Act (33 U.S.C. 1321 [j]) by two or more Federal agencies.

Debrief: A debriefing is a forum for planners, *facilitators, controllers, and evaluators* to review and provide feedback after the exercise is held. It should be a facilitated discussion that allows each person an opportunity to provide an overview of the functional area they observed and document strengths and areas for improvement. The *exercise planning team* leader or the *exercise program manager* facilitate debriefs, and results are captured for inclusion in the *AAR/IP*. A debriefing is different from a *hot wash*, in that a hot wash is intended for players to provide feedback.

Equipment Deployment Exercise: An equipment deployment exercise is an exercise during which response equipment is deployed to a specific site and operated in its normal operating medium.

Equipment Activation: Equipment activation is the movement, staging, deployment, or operation of response equipment, as determined by the plan holder in consultation with the exercise design team.

Evaluation: One of the five phases of the exercise process, evaluation is the cornerstone of exercises; it documents strengths and opportunities for improvement in an entity's preparedness and is the first step in the improvement process. Under the HSEEP, evaluations are conducted through player observation and the use of Exercise Evaluation Guides (EEGs), which outline exercise performance measures expected from players.

Evaluators: Selected from participating agencies, evaluators are chosen based on their expertise in the functional areas they will observe. Evaluators use EEGs to measure and assess performance, capture unresolved issues, and analyze exercise results. Evaluators passively assess and document players' performance against established emergency plans and exercise evaluation criteria, in accordance with HSEEP standards. Evaluators have a passive role in the exercise and only note the actions/decisions of players without interfering with exercise flow.

Event: Within the MSEL, an event is an expected action that is expected to take place during an exercise.

Exercise Design Team: This team is comprised of Federal, state, and industry representatives who have responsibility for designing an area exercise.

Exercise Evaluation Guide: EEGs are HSEEP documents that support the exercise evaluation process by providing evaluators with consistent standards for observation, analysis, and *AAR/IP* development. Each EEG is linked to a target capability and provides standard activities, performance measures, and tasks to be evaluated based on the exercise objectives. Additionally, an EEG contains a Capability Narrative section, in which evaluators provide a general chronological narrative of exercise events associated with the capability, and an Evaluator Observations section in which evaluators provide specific strengths and areas of improvement linked to the capability. The consistent guidelines provided in EEGs facilitate creation of *AAR/IPs*, resulting in actionable *IPs* that target specific personnel, planning, organization, equipment, and training needs within capabilities.

Final Planning Meeting: The FPM is the final forum for the exercise planning team to review the process and procedures for exercise conduct, final drafts of all exercise materials, and all logistical requirements. During the FPM, there should be no major changes made to either the design or the scope of the exercise, or to any supporting documentation. The FPM ensures all logistical requirements have been arranged, all outstanding issues have been identified and resolved, and all exercise products are ready for printing.

For Official Use Only (FOUO): FOUO is the term used within DOI to identify unclassified information of a sensitive nature, not otherwise categorized by statute or regulation, the unauthorized disclosure of which could adversely impact a person's privacy or welfare, the conduct of Federal programs, or other programs or operations essential to national interest. Information impacting the National Security of the United States and classified Confidential, Secret, or Top Secret under Executive Order 12958, "Classified National Security Information," as amended, or its predecessor or successor orders, is not to be considered FOUO. FOUO is not to be considered classified information. (From <http://www.fas.org/sgp/othergov/dhs-sbu.html>)

Ground Truth: Ground Truth is a component of exercise documentation comprised of the detailed elements of the scenario that must remain consistent during exercise development and be conducted to ensure that realism is maintained and objectives are met in the unscripted move-countermove exercise environment.

Ground Truth Advisor: In preparedness exercises, the Ground Truth advisor tracks how the moves and countermoves of the spill response operating/management teams and players (e.g., regulatory agency, natural resource trustees, responsible party) change the fabric of the exercise environment, potentially creating additional elements of the Ground Truth, but never detracting from it.

Hazardous Substance: For the purposes of PREP Section 3, the chemicals for which plan holders are required to prepare response plans by the Coast Guard under 33 CFR §154, §155 .

Hazardous Substance Response Organization (HSRO): For the purposes of PREP Section 3, HSRO refers to companies involved with hazardous substance response, removal, and remediation. This acronym does not suggest the same classification standards that are required by OSROs.

Homeland Security Exercise and Evaluation Program: HSEEP is a capabilities- and performance-based exercise program that provides standardized policy, doctrine, and terminology for the design, development, conduct, and evaluation of homeland security exercises. HSEEP also provides tools and resources to facilitate the management of self-sustaining homeland security exercise programs.

Hot Wash: A hot wash is a facilitated discussion held immediately following an exercise among exercise players from each functional area. It is designed to capture feedback about any issues, concerns, or proposed improvements players may have about the exercise. The hot wash is an opportunity for players to voice their opinions on the exercise and their own performance. This facilitated meeting allows players to participate in a self-assessment of the exercise play and provides a general assessment of how the entity performed in the exercise. At this time, evaluators can also seek clarification on certain actions and what prompted players to take them. Evaluators should take notes during the hot wash and include these observations in their analysis. The hot wash should last no more than 30 minutes.

Improvement Plan: For each task, the IP lists the corrective actions that will be taken, the responsible party or agency, and the expected completion date. The IP is included at the end of the AAR.

Industry: For the purpose of these guidelines, industry means the vessels, marine transportation-related (MTR) facilities, onshore and certain offshore non-transportation-related facilities, pipelines, and offshore platforms for which response plans for oil spills are required to be submitted by O/Os. The response plan requirements and regulations for these entities are administered by the Coast Guard, EPA, Pipeline and Hazardous Materials Safety Administration, and Bureau of Safety and Environmental Enforcement.

Initial Planning Meeting: The IPM is typically the first step in the planning process and lays the foundation for the exercise. Its purpose is to gather input from the exercise planning team on the scope, design requirements and conditions (such as assumptions and artificialities), objectives, level of participation, and scenario variables (e.g., location, threat/hazard selection), and MSEL. During the IPM, the exercise planning team decides on exercise location, schedule, duration, and other details required to develop exercise documentation. Planning team members should be assigned responsibility for the tasks outlined during the meeting.

Injects: Injects are MSEL entries that controllers must simulate; they include directives, instructions, and decisions. Exercise controllers provide injects to exercise players to drive exercise play toward the achievement of objectives. Injects can be written, oral, televised, and/or transmitted via any means; e.g., fax, phone, email, voice, radio, or sign. Injects can be contextual or contingency. A controller introduces a contextual inject to a player to help build the exercise operating environment. For example, if the exercise is designed to test information-sharing capabilities, an MSEL inject can be developed to direct a controller to select an actor to portray a suspect. The inject could then instruct the controller to prompt another actor to approach a law enforcement officer and inform him/her that this person was behaving suspiciously. A controller verbally introduces a contingency inject to a player if players are not performing the actions needed to sustain exercise play. This ensures that play moves forward, as needed, to adequately test performance of activities. For example, if a simulated secondary device is placed at an incident scene during a terrorism response exercise, but is not discovered, a controller may want to prompt an actor to approach a player to say that he/she witnessed suspicious activity close to the device location. This should prompt the responder's discovery of the device, and result in subsequent execution of the desired notification procedures.

Integrated Timeline: The integrated timeline provides a retrospective timeline of exercise events created during exercise analysis.

Lead Evaluator: The lead evaluator should participate fully as a member of the *exercise planning team*, and should be a senior-level individual familiar with *prevention, protection, response, and/or recovery* issues associated with the exercise; plans, policies, and procedures of the exercising entity; Incident Command and decisionmaking processes of the exercising entity; and interagency and/or interjurisdictional coordination issues relevant to the exercise. The lead evaluator must have the management skills needed to oversee a team of *evaluators* over an extended process, as well as the knowledge and analytical skills to undertake a thorough and accurate *analysis* of all *capabilities* being tested during an exercise.

Lessons Learned: Lessons learned are knowledge and experience (both positive and negative) derived from observations and historical study of actual operations, training, and exercises. Exercise AAR/IPs should identify lessons learned and highlight *best practices*, and should be submitted to the Department of Homeland Security for inclusion in the lessons learned/best practices Web portal, www.llis.gov, which serves as a national network for generating, validating, and disseminating lessons learned and best practices.

Master Scenario Events List: The MSEL is a chronological timeline of expected actions and scripted events that controllers inject into exercise play to generate or prompt player activity. It ensures necessary events happen so that all objectives are met. Larger, more complex exercises may also employ a Procedural Flow (ProFlow), which differs from the MSEL in that it only contains expected player actions or events. The MSEL links simulation to action, enhances exercise experience for players, and reflects an incident or activity meant to prompt players to action. Each MSEL record contains a designated scenario time, an event synopsis, the name of the controller responsible for delivering the inject and, if applicable, special delivery instructions, the task and objective to be demonstrated, the expected action, the intended player, and a note-taking section.

Master Scenario Events List Meeting: The MSEL Meeting may be held in preparation for more complex, operations-based exercises, specifically to review the scenario timeline and focus on MSEL development.

Mid-Term Planning Meeting: The MPM, an operations-based exercise planning meeting, is used to discuss exercise organization and staffing concepts; scenario and timeline development; and scheduling, logistics, and administrative requirements. It is also a session to review draft documentation; e.g., scenario, ExPlan, C/E Handbook, MSEL. (Note: An MSEL Meeting can be held in conjunction with or separate from the MPM to review the scenario timeline for the exercise.)

National Exercise Schedule: NEXS is a compilation of all national-level, Federal, state, and local exercises. NEXS provides basic information on each planned exercise including the exercise name, location, date, major *participants*, and points of contact. It also serves as a management tool and reference document for *exercise planning* and enables exercise visibility to planners and leadership.

National Incident Management System: The NIMS standard was designed to enhance the ability of the United States to manage domestic incidents by establishing a single, comprehensive system for incident management. It is a system mandated by *HSPD-5* that provides a consistent, nationwide approach for Federal, state, local, and tribal governments; the private sector; and nongovernmental organizations to work effectively and efficiently together to *prepare for, respond to, and recover from* domestic incidents, regardless of cause, size, or complexity.

National Preparedness Goal: The National Preparedness Goal defines the core capabilities necessary to prepare for the specific types of incidents that pose the greatest risk to the security of the Nation. The Goal emphasizes actions aimed at achieving an integrated, layered, and all-of-Nation preparedness approach that optimizes the use of available resources. Specifically, the Goal defines success as: A secure and resilient Nation with the capabilities required across the whole community to prevent, protect against, mitigate, respond to, and recover from the threats and hazards that pose the greatest risk.

National Response System: Under 40 CFR Part 300 (The National Oil and Hazardous Substances Pollution Contingency Plan), the National Response System (NRS) includes the National Response Team, Regional Response Teams, Area Committees, On-Scene Coordinators, and state and local government entities involved with response planning and coordination. The PREP, consistent with OPA 90 objectives, specifically involves the private sector with the NRS in order to ensure effective exercise development, delivery, and coordination.

Objectives: Exercise objectives must be established for every exercise. Well-defined objectives provide a framework for *scenario* development, guide individual organizations' objective development, and inform exercise *evaluation* criteria. Entities should frame exercise objectives with the aim of attaining *capabilities* established as priorities at the Federal, state, and local level, as captured in the entity's *Multi-Year Training and Exercise Plan* and schedule. Objectives should reflect specific capabilities that the exercising entity establishes as priorities, and the *tasks* associated with those capabilities. Objectives should be *simple, measurable, achievable, realistic, and task-oriented (SMART)*. Planners should limit the number of exercise objectives to enable timely execution and to facilitate design of a realistic scenario.

Observers: Observers do not directly participate in the exercise; rather, they observe selected segments of the exercise as it unfolds while remaining separated from player activities. Observers view the exercise from a designated observation area and are asked to remain within the observation area during the exercise. A dedicated group of exercise controllers should be assigned to manage these groups. In a *discussion-based* exercise, observers may support the development of player responses to the situation during the discussion by delivering messages or citing references.

Observer Briefing: An observer briefing is a pre-exercise overview given by one or more members of the *exercise planning team* to educate *observers* about program background, *scenario*, schedule of *events*, observer limitations, and any other miscellaneous information. (Note: Many times, observers are unfamiliar with public safety procedures and have questions about the activities they see. Designating someone to answer questions, such as a response agency PIO, will prevent observers from asking questions of *players*, *controllers*, or *evaluators*).

Oil Spill Removal Organization (OSRO): An OSRO is an entity that provides response resources. An OSRO includes, but is not limited to, any for-profit or not-for-profit contractor, cooperative, or in-house response resources established in a geographic area to provide required response resources.

On-Scene Coordinator (OSC): The OSC is the Federal official predesignated by EPA or the USCG prior to an oil spill to coordinate and direct Federal responses under Subpart D of the National Contingency Plan (NCP), or the official designated by the lead agency to coordinate and direct removal actions under Subpart E of the NCP.

Operating Environments: For the purposes of PREP, there are three types of operating environments (33 CFR §154, 33 CFR §155, 40 CFR §112): River and Canals, Great Lakes/Inland, and Ocean (near shore, offshore, and open ocean). If an OSRO operates in all three environments, the OSRO is required to conduct an exercise of the minimum amount of equipment in each of the environments. If the OSRO only operates in two of the environments, it must conduct the exercises in the two environments.

Participants: Participants are the overarching group that includes all *players*, *controllers*, *evaluators*, and staff involved in conducting an exercise.

Participant Feedback Form: Participant Feedback Forms are used to obtain information on perceptions of the exercise and how well each *participant* thought his/her unit performed. This information can provide insight into why events happened the way they did or why some expected actions did not take place. Participant Feedback Forms are distributed before a *hot wash* and collected at the end, and the *evaluation* team reviews them in order to capture any useful information. Participant Feedback Forms also serve to solicit general feedback on exercise quality, which can be provided to the *exercise planning team* to help implement improvements in future exercises because this contributes to several portions of the *AAR/IP*.

Personal Protective Equipment: Equipment that meets the requirements contained in OSHA Hazardous Waste Regulations 29 CFR §1910.120.

Plan Holder: The plan holder is the owner, operator, or in some cases an affiliated company, submitting a response plan required by Federal regulation that covers one or more facilities (e.g., vessels, MTR facilities, onshore and certain offshore non-transportation-related facilities, pipelines, or offshore facilities).

Planning Meetings: The *exercise planning team* holds planning meetings as forums to *design* and *develop* exercises. The *scope*, type, and complexity of an exercise determines the number of meetings necessary to successfully conduct an exercise. These milestones of the exercise planning process are typically comprised of the *IPM*, the *MPM*, and the *FPM*. Potential additional exercise planning meetings include the *C&O Meeting* and the *MSEL Meeting*. *Discussion-based* exercises usually convene *IPMs* and *FPMs*, whereas *operations-based* exercises may call for an *IPM*, *MPM*, *FPM*, as well as an *MSEL Meeting*.

Player: Players have an active role in *preventing*, *responding* to, or *recovering* from the risks and hazards presented in the exercise *scenario*, by either discussing (in a discussion-based exercise) or performing (in an *operations-based* exercise) their regular roles and responsibilities. *Players* initiate actions that will respond to and/or mitigate the simulated emergency.

Player Briefing: The player briefing, held immediately prior to an *operations-based* exercise, addresses individual roles and responsibilities, exercise parameters, safety, badges, and any other logistical items. For a *drill* or *FSE*, player briefings typically take place in the *assembly area*.

Preparedness: The preparedness mission is the range of deliberate, critical tasks and activities necessary to build, sustain, and improve the operational capability to prevent, protect against, respond to, and recover from domestic incidents. Preparedness is a continuous process involving efforts at all levels of Government and between Government and private sector and nongovernmental organizations to identify threats, determine vulnerabilities, and identify required resources. It also involves the existence of plans, procedures, policies, training, and equipment necessary at the Federal, state, and local level to maximize the ability to prevent, respond to, and recover from major incidents. The term “readiness” is used interchangeably with preparedness.

Primary Oversight Agency: The primary oversight agency is the agency with regulatory authority over a particular industry. For the purposes of the PREP, the four primary oversight agencies and the industries they regulate are the USCG (vessels, MTR facilities), the EPA (onshore and certain offshore non-transportation-related facilities), the Research and Special Programs Administration (pipelines), and the BSEE (offshore facilities).

Qualified Individual (QI): A QI is the person located in the United States who meets the requirements identified in the respective Federal regulations (USCG, EPA, PHMSA, BSEE), and who is authorized to do the following: (1) Activate and engage in contracting with OSROs; (2) act as a liaison with the On-Scene Coordinator; and (3) obligate funds required to effectuate response activities. The QI will be the individual or a designee identified in the response plan.

Recommendations: Recommendations, based on *root-cause analysis*, are listed in all *AAR/IPs*. Recommendations are the identification of areas for improvement as noted during an exercise.

Root Cause Analysis: Root-Cause Analysis of the integrated timeline focuses on identifying the most basic causal factor for why an expected action did not occur or was not performed as expected.

Safety Controller: The safety controller is responsible for monitoring exercise safety during exercise setup, conduct, and cleanup. All exercise *controllers* assist the safety controller by reporting any safety concerns. The safety controller should not be confused with the safety officer, who is identified by the incident commander during exercise play.

Scenario: A scenario provides the backdrop and storyline that drive an exercise. The first step in designing a scenario is determining the type of threat/hazard (e.g., chemical, explosive, cyber, natural disaster) to be used in an exercise. The hazards selected for an exercise should realistically stress the capabilities an entity is attempting to improve through its exercise programs. A hazard should also be a realistic representation of potential threats faced by the exercising entity. For *discussion-based* exercises, a scenario provides the backdrop that drives *participant* discussion. For *operations-based* exercises, the scenario should provide background information on the incident catalyst of the exercise. For *prevention* exercises, the scenario should include the *Ground Truth*.

Scope: Scope is an indicator of the level of Government or private sector participation in exercise play, regardless of *participant* size. Scope levels include local, multilocal, regional (within a state), state, multi-state, Federal, national, international, and private sector.

Self-Certification: Self-certification is the term used to indicate when the plan holder declares that he or she has met the following standards: (1) Completion of the exercise; (2) conducting the exercise in accordance with the PREP guidelines, meeting all objectives listed; and (3) evaluation of the exercise using a mechanism that appraises the effectiveness of the response or contingency plan.

Self-Evaluation: Self-evaluation means that the plan holder is responsible for carefully examining the effectiveness of the plan for response during the exercise. The plan holder may choose the mechanism for conducting this appraisal, as long as it appropriately measures the plan effectiveness. The plan holder is responsible for addressing issues that arise in the exercise that would lead to improvements in the response plan or any aspect of preparedness for spill response. The plan holder is responsible for incorporating necessary changes to the response plan as a result of the exercise.

Seminars: Seminars orient *participants* to authorities, strategies, plans, policies, procedures, protocols, resources, concepts, and/or ideas. Seminars provide a good starting point for entities that are developing or making major changes to their plans and procedures.

Simple, Measurable, Achievable, Realistic, Task-Oriented (SMART): SMART is a set of guidelines for developing viable exercise *objectives*.

Simulation: (1) An electronic simulation is a method for predicting the results of implementing a model over time. (2) Simulation of nonparticipating personnel and agencies is a technique for increasing realism in exercises.

Spill Response Management Team: The spill response management team is the group of personnel identified to staff the appropriate organizational structure to manage spill response implementation in accordance with the response plan.

Subject Matter Expert: SMEs add functional knowledge and expertise in a specific area or in performing a specialized job, task, or skill to the *exercise planning team*. They help to make the *scenario* realistic and plausible, and ensure that entities have the appropriate *capabilities* to respond.

Tabletop Exercise: For the purpose of the PREP, a tabletop exercise is an exercise of the response plan and the spill response management team's response efforts without the actual deployment of response equipment. *For the purpose of HSEEP*, TTXs are intended to stimulate discussion of various issues regarding a hypothetical situation. They can be used to assess plans, policies, and procedures or to assess types of systems needed to guide the *prevention of, response to, or recovery from* a defined incident. During a TTX, senior staff, elected or appointed officials, or other key personnel meet in an informal setting to discuss simulated situations. TTXs are typically aimed at facilitating understanding of concepts, identifying strengths and shortfalls, and/or achieving a change in attitude. *Participants* are encouraged to discuss issues in depth and develop decisions through slow-paced problem solving rather than the rapid, spontaneous decisionmaking that occurs under actual or simulated emergency conditions. TTXs can be breakout (i.e., groups split into functional areas) or plenary; i.e., one large group.

Tasks: Tasks are specific, discrete actions that individuals or groups must complete or discuss during an exercise to successfully carry out an activity. Successful execution of performance measures and tasks, either sequentially or in parallel, is the foundation for activities, which are, in turn, the foundation of capabilities.

Timely: (As used in relation to USCG and EPA Government-initiated unannounced exercise programs.) means the times established in the appropriate response planning regulations issued by the EPA and USCG for providing response resources to a small or average most probable spill.

Unified Command: This entity is a command structure consisting of the On-Scene Coordinator, the State representative, the Responsible Party, and other parties as appropriate. The Unified Command is utilized during a spill response to achieve the coordination necessary to carry out an effective and efficient response.

Verification: Verification is the act of ensuring that an exercise was properly documented and certified. The Coast Guard, EPA, PHMSA, or BSEE shall conduct verification activities as per each agency's own SOP. Verification of the exercise and exercise-related training records may be conducted through normal operations of the regulatory agency, such as inspections, boarding, spot checks, evaluations, audits, or other systems developed to ensure exercises are being conducted and properly documented.

Vessel: For the purpose of the oil spills, a vessel is any vessel required by 33 CFR §155.1015 to submit a response plan. For the purpose of hazardous substance releases, a vessel is any vessel required by 33 CFR §155.3030 to submit a response plan. A vessel includes unmanned barges.

Workshop: The workshop, a type of *discussion-based* exercise, represents the second tier of exercises in the *building block approach*. Although similar to *seminars*, workshops differ in two important aspects— increased *participant* interaction, and a focus on achieving or building a product; e.g., plans, policies. A workshop is typically used to test new ideas, processes, or procedures; train groups in coordinated activities; and obtain consensus. Workshops often use breakout sessions to explore parts of an issue with smaller groups.



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ORC Capability: Appendix Reference

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Master Review Matrix Completion Index*			Review Scope: <input type="checkbox"/> Full <input type="checkbox"/> Partial <input type="checkbox"/> Targeted	
OSPD Tracking Number:		OSRP Name:		
§254.1	Who must submit a spill response plan?		§254.27	What information must be included in the "Dispersant Use Plan" Appendix?
<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III	Comments? Y / N	<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III
		A-1		Comments? Y / N
				B-12
§254.2	When must I submit a response plan?		§254.28	What information must be included in the "In Situ Burning Plan" Appendix?
<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III	Comments? Y / N	<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III
		A-2		Comments? Y / N
				B-13
§254.3	May I cover more than one facility in my response plan?		§254.29	What information must be included in the "Training and Drills" Appendix?
<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III	Comments? Y / N	<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III
		A-3, 4		Comments? Y / N
				B-14
§254.4	May I reference other documents in my response plan?		§254.42	Exercises for response personnel and equipment.
<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III	Comments? Y / N	<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III
		A-5		Comments? Y / N
				C-1
§254.5	General response plan requirements.		§254.44	Calculating response equipment effective daily recovery capacity (EDRC).
<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III	Comments? Y / N	<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III
		A-5, 6		Comments? Y / N
				C-2
§254.7	How do I submit my response plan to the BSEE?		§254.47	Determining the volume of oil of your WCD scenario.
<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III	Comments? Y / N	<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III
		A-6		Comments? Y / N
				C-3, 4
§254.21	How must I format my response plan?		§254.50	Spill response plans for facilities located in State waters seaward of the coastline.
<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III	Comments? Y / N	<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III
		B-1		Comments? Y / N
				D-1
§254.22	What information must be included in the "Introduction and Plan Contents" section?		§254.51	Modifying an existing Outer Continental Shelf (OCS) response plan.
<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III	Comments? Y / N	<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III
		B-2		Comments? Y / N
				D-1
§254.23	What information must I include in the "Emergency Response Action Plan" section?		§254.52	Following the format for an OCS response plan.
<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III	Comments? Y / N	<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III
		B-3, 4, 5, 6, 7		Comments? Y / N
				D-1
§254.24	What information must be included in the "Equipment Inventory" Appendix?		§254.53	Submitting a response plan developed under State requirements.
<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III	Comments? Y / N	<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III
		B-8		Comments? Y / N
				D-2, 3
§254.25	What information must be included in the "Contractual Agreements" Appendix?		§254.54	Spill prevention for facilities located in State waters seaward of the coastline.
<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III	Comments? Y / N	<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III
		B-8		Comments? Y / N
				D-4
§254.26	What information must be included in the "WCD Scenario" Appendix?			
<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III	Comments? Y / N	<input type="checkbox"/> P-I	<input type="checkbox"/> P-II <input type="checkbox"/> P-III
		B-9, 10, 11		Comments? Y / N

*NOTE: This index is for reference purposes only and any citation section not selected here was not reviewed as part of this OSRP Review activity.

OSPD Tracking Number:	OSRP Name:	Review Completed
<p>30 CFR §254 Subpart A: General</p>	<p>Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans</p>	<p><input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III</p>
<p>(a) <i>If you are the owner or operator of an oil handling, storage, or transportation facility, and it is located seaward of the coastline, you must submit a spill response plan to the Bureau of Safety and Environmental Enforcement (BSEE) for approval. Your spill response plan must demonstrate that you can respond quickly and effectively whenever oil is discharged from your facility. Refer to §254.6 for the definitions of "oil," "facility," and "coastline" if you have any doubts about whether to submit a plan.</i></p>	<p><i>Page 2, Lines 65-67: During BSEE's review of regional OSRPs, Oil Spill Preparedness Division (OSPD) staff will analyze the content to ensure that you demonstrate the ability to respond quickly and effectively whenever oil is discharged from a covered facility as required by 30 CFR §254.</i></p> <p><i>Page 2, Lines 73-76: The goal for this NTL is to clarify the requirements in 30 CFR §254 and ensure national consistency in regional OSRP preparation. This NTL is also designed to encourage you to include in your OSRPs flexible and innovative offshore oil spill response techniques, particularly for a continuous high-rate spill.</i></p> <p>Comments:</p>	<p><input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III</p>
<p>(b) <i>You must maintain a current response plan for an abandoned facility until you physically remove or dismantle the facility or until the Regional Supervisor notifies you in writing that a plan is no longer required.</i></p>	<p>Not Specifically Addressed by NTL</p> <p>Comments:</p>	<p><input type="checkbox"/> P-I <input type="checkbox"/> P-II</p>
<p>(c) <i>Owners or operators of offshore pipelines carrying essentially dry gas do not need to submit a plan. However, you must submit a plan for a pipeline that carries:</i></p> <p>(1) <i>Oil, (2) Condensate that has been injected into the pipeline, (3) Gas and naturally occurring condensate</i></p> <p>(d) and (e) <i>Not applicable to plan review</i></p>	<p>Not Specifically Addressed by NTL</p> <p>Comments:</p>	<p><input type="checkbox"/> P-I <input type="checkbox"/> P-II</p>
<p>30 CFR §254.1 Who must submit a spill response plan?</p>		

Footnote 1: As defined by 30 CFR §254.6, 'you' means the owner or operator and in the case of an offshore facility, any person owning or operating such offshore facility. When conducting an OSRP review, the reviewer shall attempt to evaluate if the owner or operator complied with the applicable regulatory requirement. Positive compliance evaluations do not require a written statement in the comments section once the phased review has been checked complete. However, a negative compliance evaluation does require a written comment statement by the OSRP reviewer. This applies to the entire review process as documented within this forms package.

<p>30 CFR §254 Subpart A: General</p>	<p>Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans</p>	<p>Review Completed</p> <p><input type="checkbox"/> P-I</p> <p><input type="checkbox"/> P-II</p>
<p>Not Specifically Addressed by NTL</p>	<p>Comments: (Reviewer shall utilize Worst Case Discharge Verification Worksheet to assist in compliance determination.)</p>	<p>30 CFR §254.2 When must I submit a response plan?</p> <p>(a) You must submit, and BSEE must approve, a response plan that covers each facility located seaward of the coastline before you may use that facility. To continue operations, you must operate the facility in compliance with the plan.</p> <p>(b) Despite the provisions of paragraph (a) of this section, you may operate your facility after you submit your plan while BSEE reviews it for approval. To operate a facility without an approved plan, you must certify in writing to the Regional Supervisor that you have the capability to respond, to the maximum extent practicable, to a worst case discharge (WCD) or a substantial threat of such a discharge. The certification must show that you have ensured by contract, or other means approved by the Regional Supervisor, the availability of private personnel and equipment necessary to respond to the discharge. Verification from the organization(s) providing the personnel and equipment must accompany the certification. BSEE will not allow you to operate a facility for more than 2 years without an approved plan.</p> <p>(c) If you have a plan that BSEE already approved, you are not required to immediately rewrite the plan to comply with this part. However, you must submit the information this regulation requires when submitting your first plan revision (see § 254.30) after the effective date of this rule. The Regional Supervisor may extend this deadline upon request.</p>

30 CFR §254 Subpart A: General	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
<p>30 CFR §254.3 May I cover more than one facility in my response plan?</p> <p>(a) Your response plan may be for a single lease or facility or a group of leases or facilities. All the leases or facilities in your plan must have the same owner or operator (including affiliates) and must be located in the same BSEE Region (see definition of Regional Response Plan in §254.6).</p>	<p>OSRP Submission Considerations: Page 2, Lines 54-57</p> <p>Comments: (In some cases, a plan holder's OSRP may cover multiple affiliated owners/operators. See the Regulatory Responsibilities and Relationships section of the OSPD Manual (pages 11-12) for further details.)</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>(b) Regional Response Plans must address all the elements required for a response plan in Subpart B, Oil Spill Response Plans for Outer Continental Shelf Facilities, or Subpart D, Oil Spill Response Requirements for Facilities Located in State Waters Seaward of the Coastline, as appropriate.</p>	<p>Page 4, Lines 159-162</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>(c) When developing a Regional Response Plan, you may group leases or facilities subject to the approval of the Regional Supervisor for the purposes of:</p> <p>(1) Calculating response times</p>	<p>Page 5, Lines 198-200</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>(2) Determining quantities of response equipment</p>	<p>Not Specifically Addressed by NTL</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>(3) Conducting oil spill trajectory analyses</p>	<p>Not Specifically Addressed by NTL</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II

30 CFR §254 Subpart A: General	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
(4) Determining WCD scenarios	<p>Page 28, Appendix H. Worst Case Discharge Scenarios (30 CFR §254.3(c)(4) and 30 CFR §254.26)</p> <p>Comments: (Reviewer shall utilize Worst Case Discharge Verification Worksheet to assist in compliance determination.)</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
(5) Identifying areas of special economic and environmental importance that may be impacted and the strategies for their protection.	<p>Not Specifically Addressed by NTL</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
(d) The Regional Supervisor may specify how to address the elements of a Regional Response Plan. The Regional Supervisor also may require that Regional Response Plans contain additional information, if necessary, for compliance with appropriate laws and regulations.	<p>Page 4, Lines 164-175 Page 5, Lines 202-205 Page 34: Appendix J. Oceanographic and Meteorological Information [30 CFR §254.3(d)]</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
30 CFR §254.3 May I cover more than one facility in my response plan?		

30 CFR §254 Subpart A: General	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
<p>You may reference information contained in other readily accessible documents in your response plan. Examples of documents that you may reference are the National Contingency Plan (NCP), Area Contingency Plan (ACP), BSEE, or Bureau of Ocean Energy Management environmental documents, and Oil Spill Removal Organization (OSRO) documents that are readily accessible to the Regional Supervisor. You must ensure that the Regional Supervisor possesses or is provided with copies of all OSRO documents you reference. You should contact the Regional Supervisor if you want to know whether a reference is acceptable.</p>	<p>Page 2, Lines 69-71: BSEE will evaluate whether you have demonstrated that sufficient measures are in place to ensure that all spill response efforts are efficient, coordinated, and effective as required by the NCP.</p> <p>Page 34: Appendix K. Bibliography (30 CFR §254.4)</p> <p>List each referenced publication showing the title, author(s)/editor(s), publisher, and date of publication.</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>30 CFR §254.4 May I reference other documents in my response plan?</p>	<p>OSRP Content Considerations: Page 3, Lines 103-121</p> <p>Page 5, Lines 207-208: Clarify that, when identifying adequate provisions for monitoring the movement of a spill under § 254.23(g)(2), you should use the distance of facilities farthest from shore.</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>30 CFR §254.5 General response plan requirements</p>	<p>(a) The response plan must provide for response to an oil spill from the facility. You must immediately carry out the provisions of the plan whenever there is a release of oil from the facility. You must also carry out the training, equipment testing, and periodic drills described in the plan, and these measures must be sufficient to ensure the safety of the facility and to mitigate or prevent a discharge or a substantial threat of a discharge.</p> <p>(b) The plan must be consistent with the NCP and the appropriate ACP(s).</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>30 CFR §254.5 General response plan requirements</p>	<p>Page 4, Lines 141-157</p> <p>Comments: (Reviewer shall utilize the ACP Consistency Evaluation Worksheet to assist in compliance determination.)</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III

30 CFR §254 Subpart A: General	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
<p>(c) Nothing in this part relieves you from taking all appropriate actions necessary to immediately abate the source of a spill and remove any spills of oil.</p>	<p>Page 3, Lines 123-130 Page 4, Lines 178-190 Page 5, Lines 192-196</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>(d) In addition to the requirements listed in this part, you must provide any other information the Regional Supervisor requires for compliance with appropriate laws and regulations.</p>	<p>Page 3, Lines 132-139</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>§ 254.6 Definitions. (Not included here, not applicable to plan review)</p>		

30 CFR §254 Subpart A: General	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
<p>How do I submit my response plan to the BSEE? You must submit the number of copies of your response plan that the appropriate BSEE regional office requires. If you prefer to use improved information technology such as electronic filing to submit your plan, ask the Regional Supervisor for further guidance.</p>	<p>OSRP Review and Revision Procedures Page 6, Lines 224-238</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>§254.8 May I appeal decisions under this part? (Not included here, not applicable to plan review)</p>		
<p>§254.9 Authority for information collection. (Not included here, not applicable to plan review)</p>		

OSPD Tracking Number:	OSRP Name:	
30 CFR §254 Subpart B: Oil Spill Response Plans (OSRPs) for Outer Continental Shelf (OCS) Facilities	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
§254.20 Purpose. (Not included here, not applicable to plan review)		
<p>(a) <i>You must divide your response plan for OCS facilities into the sections specified in paragraph (b) of this section and explained in the other sections of this subpart. The plan must have an easily found marker identifying each section. You may use an alternate format if you include a cross-reference table to identify the location of required sections. You may use alternate contents if you can demonstrate to the Regional Supervisor that they provide for equal or greater levels of preparedness.</i></p>	<p>Page 5: Section 1. OSRP Quick Guide (Optional)</p> <p>Provide a concise set of easy-to-follow instructions that you will adhere to in the event of an oil spill. Instructions should include all immediate actions and notifications that you are required to take or make. Flowcharts, check lists, and tables may be used as you deem appropriate.</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
30 CFR §254.21 How must I format my response plan?	<p>Page 5: Section 2. Table of Contents</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III

30 CFR §254 Subpart B: Oil Spill Response Plans (OSRPs) for Outer Continental Shelf (OCS) Facilities	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
<p>The "Introduction and Plan Contents" section must provide:</p> <p>(a) Identification of the facility that the plan covers, including its location and type</p>	<p>Page 9: Section 3. Introduction (30 CFR §254.22) Page 19: Appendix A. Facility Information [30 CFR §254.22(a) and 30 CFR §254.23(e)]</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>(b) A table of contents.</p>	<p>Page 5: Section 2. Preface [30 CFR §254.22(b)]</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>(c) A record of changes made to the plan</p>	<p>Page 5: Section 2. Preface [30 CFR §254.22(b)]</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>(d) A cross-reference table, if needed, because you are using an alternate format for your plan.</p>	<p>Page 5: Section 2. Preface [30 CFR §254.22(b)]</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>30 CFR §254.22 What information must be included in the "Introduction and Plan Contents" section?</p>		

30 CFR §254 Subpart B: Oil Spill Response Plans (OSRPs) for Outer Continental Shelf (OCS) Facilities	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
<p>The "Emergency Response Action Plan" section is the core of the response plan. Put information in easy-to-use formats such as flow charts or tables where appropriate. This section must include:</p> <p>(a) Designation, by name or position, of a trained qualified individual (QI) who has full authority to implement removal actions and ensure immediate notification of appropriate Federal officials and response personnel.</p>	<p>Page 10: Section 4. Organization (30 CFR §254.23(a)-(c))</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>(b) Designation, by name or position, of a trained spill management team available on a 24-hour basis. The team must include a trained spill response coordinator and alternate(s) who have the responsibility and authority to direct and coordinate response operations on your behalf. You must describe the team's organizational structure as well as the responsibilities and authorities of each position on the spill management team.</p>	<p>Page 10: Section 4. Organization (30 CFR §254.23(a)-(c))</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>(c) Description of a spill response operating team. Team members must be trained and available on a 24-hour basis to deploy and operate spill response equipment. They must be able to respond within a reasonable minimum specified time. You must include the number and types of personnel available from each identified labor source.</p>	<p>Page 10: Section 4. Organization (30 CFR §254.23(a)-(c))</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II

30 CFR §254.23 What information must I include in the "Emergency Response Action Plan" section?

30 CFR §254 Subpart B: Oil Spill Response Plans (OSRPs) for Outer Continental Shelf (OCS) Facilities	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
<p>30 CFR §254.23 What information must I include in the "Emergency Response Action Plan" section?</p> <p>(d) A planned location for a spill response operations center and provisions for primary and alternate communications systems available for use in coordinating and directing spill response operations. You must provide telephone numbers for the response operations center. You also must provide any facsimile numbers and primary and secondary radio frequencies that will be used.</p>	<p>Page 11: Section 5. Spill Response Operations Center and Communications [30 CFR §254.23(d)]</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>(e) A listing of the types and characteristics of the oil handled, stored, or transported at the facility.</p>	<p>Page 19: Appendix A. Facility Information [30 CFR §254.22(a) and 30 CFR §254.23(e)]</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>(f) Procedures for the early detection of a spill.</p>	<p>Page 11: Section 6. Spill Detection and Source Identification and Control [30 CFR §254.23(f) and (g)]</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III

30 CFR §254 Subpart B: Oil Spill Response Plans (OSRPs) for Outer Continental Shelf (OCS) Facilities	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
<p>(g) Identification of procedures you will follow in the event of a spill or a substantial threat of a spill. The procedures should show appropriate response levels for differing spill sizes including those resulting from a fire or explosion. These will include, as appropriate:</p> <p>(1) Your procedures for spill notification. The plan must provide for the use of the oil spill reporting forms included in the Area Contingency Plan (ACP) or an equivalent reporting form.</p>	<p>Page 12: Section 7. QI, SMT, SROT, and OSRO Notifications [30 CFR §254.23(g)(1)]</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>(i) Your procedures must include a current list that identifies the following by name or position, corporate address, and telephone number (including facsimile number if applicable):</p> <p>(A) The QI</p> <p>(B) The spill response coordinator and alternate(s)</p> <p>(C) Other spill response management team members</p>	<p>Page 12: Section 8. External Notifications [30 CFR §254.23(g)(1)]</p> <p>Page 27: Appendix G. ICS Compliant Notification and Reporting [30 CFR §254.23(g)(1)]</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>“Emergency Response Action Plan” section?</p> <p>30 CFR §254.23 What information must I include in the</p>	<p>Page 12: Section 7. QI, SMT, SROT, and OSRO Notifications [30 CFR §254.23(g)(1)]</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>(ii) You must also provide names, telephone numbers, and addresses for the following:</p> <p>(A) Oil spill response organizations (OSROs) that the plan cites</p> <p>(B) Federal, State, and local regulatory agencies that must be consulted to obtain site-specific environmental information</p> <p>(C) Federal, State, and local regulatory agencies that must be notified when an oil spill occurs</p>	<p>Page 13: Section 9. Available Technical Expertise [30 CFR §254.23(g)(1)(ii)(B)]</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III

30 CFR §254 Subpart B: Oil Spill Response Plans (OSRPs) for Outer Continental Shelf (OCS) Facilities	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
<p>30 CFR §254.23 What information must I include in the "Emergency Response Action Plan" section?</p> <p>(2) <i>Your methods to monitor and predict spill movement;</i></p> <p>(3) <i>Your methods to identify and prioritize the beaches, waterfowl, other marine and shoreline resources, and areas of special economic and environmental importance</i></p> <p>(4) <i>Your methods to protect beaches, waterfowl, other marine and shoreline resources, and areas of special economic or environmental importance</i></p> <p>(5) <i>Your methods to ensure that containment and recovery equipment as well as the response personnel are mobilized and deployed at the spill site</i></p>	<p>Page 13: Section 11. Spill Assessment [30 CFR §254.23(g)(2)]</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
	<p>Comments:</p>	
	<p>Page 13: Section 10. Strategic Response Planning [30 CFR §254.23(g)(3)] Page 14: Section 12. Resource Identification and Prioritization for Protection [30 CFR §254.23(g)(3)]</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
	<p>Comments:</p>	
	<p>Page 14: Section 13. Resource Protection Methods [30 CFR §254.23(g)(4)]</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>Comments:</p>		
<p>Page 14: Section 14. Mobilization and Deployment Methods [30 CFR §254.23(g)(5)] Page 32: Appendix I. Subsea Containment Information (30 CFR §254.23(g) and 30 CFR §254.24)</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III	
<p>Comments:</p>		

30 CFR §254 Subpart B: Oil Spill Response Plans (OSRPs) for Outer Continental Shelf (OCS) Facilities	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
<p>(6) Your methods to ensure that devices for the storage of recovered oil are sufficient to allow containment and recovery operations to continue without interruption</p>	Page 15: Section 16. Oil and Oiled Debris Disposal Procedures [30 CFR §254.23(g)(6) and (g)(8)]	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
	<p>Comments:</p>	
<p>(7) Your procedures to remove oil and oiled debris from shallow waters and along shorelines and for rehabilitating waterfowl that become oiled</p>	<p>Page 15: Section 15. Oil and Oiled Debris Removal Procedures [30 CFR §254.23(g)(5) and (g)(7)]</p> <p>Page 15: Section 17. Wildlife Rescue and Rehabilitation Procedures [30 CFR §254.23(g)(7)]</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
	<p>Comments:</p>	
<p>(8) Your procedures to store, transfer, and dispose of recovered oil and oil-contaminated materials and to ensure that all disposal is in accordance with Federal, State, and local requirements</p>	Page 15: Section 16. Oil and Oiled Debris Disposal Procedures [30 CFR §254.23(g)(6) and (g)(8)]	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
	<p>Comments:</p>	
<p>30 CFR §254.23 What information must I include in the "Emergency Response Action Plan" section?</p>	<p>Page 16: Section 18. Dispersant Use Plan (30 CFR §254.23(g)(9) and §254.27)</p> <p>Page 17: Section 19. <i>In Situ</i> Burning Plan (30 CFR §254.23(g)(9) and 30 CFR §254.28)</p> <p>Page 17: Section 20. Other Strategies [30 CFR §254.23(g)]</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
	<p>Comments:</p>	

30 CFR §254 Subpart B: Oil Spill Response Plans (OSRPs) for Outer Continental Shelf (OCS) Facilities	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
<p>30 CFR §254.24 What information must be included in the "Equipment Inventory" Appendix?</p> <p>Your "Equipment Inventory Appendix" must include:</p> <p>(a) An inventory of spill response materials and supplies, services, equipment, and response vessels available locally and regionally. You must identify each supplier and provide their locations and telephone numbers.</p> <p>(b) A description of the procedures for inspecting and maintaining spill response equipment in accordance with §254.43.</p>	<p>Page 27: Appendix E. Response Equipment (30 CFR §254.24)</p> <p>Page 27: Appendix F. Support Services and Supplies (30 CFR §254.24)</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>30 CFR §254.25 What information must be included in the "Contractual Agreements" Appendix?</p> <p>Your "Contractual agreements" appendix must furnish proof of any contracts or membership agreements with OSROs, cooperatives, spill response service providers, or spill management team members who are not your employees that are cited in the plan. To provide this proof, submit copies of the contracts or membership agreements or certify that contracts or membership agreements are in effect. The contract or membership agreement must include provisions for ensuring the availability of the personnel and/or equipment on a 24-hour-per-day basis.</p>	<p>Page 25: Appendix D. Contractual Agreements (30 CFR §254.25)</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III

30 CFR §254 Subpart B: Oil Spill Response Plans (OSRPs) for Outer Continental Shelf (OCS) Facilities	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
<p>The discussion of your WCD scenario must include all of the following elements:</p> <p>(a) The volume of your WCD scenario determined using the criteria in §254.47. Provide any assumptions made and the supporting calculations used to determine this volume.</p>	<p>Page 1-2, Lines 38-49: BSEE encourages you to specifically describe your planned response strategy for each WCD scenario included in your regional OSRP.</p> <p>Page 28: Appendix H. WCD Scenarios (30 CFR §254.3(c)(4) and 30 §254.26)</p> <p>Comments: (Reviewer shall utilize Worst Case Discharge Verification Worksheet to assist in compliance determination.)</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>30 CFR §254.26 What information must be included in the "WCD Scenario" Appendix?</p> <p>(b) An appropriate trajectory analysis specific to the area in which the facility is located. The analysis must identify onshore and offshore areas that a discharge potentially could affect. The trajectory analysis chosen must reflect the maximum distance from the facility that oil could move in a time period that it reasonably could be expected to persist in the environment.</p>	<p>Page 28: Appendix H. WCD Scenarios (30 CFR §254.3(c)(4) and 30 §254.26)</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>(c) A list of the resources of special economic or environmental importance that potentially could be impacted in the</p>	<p>Page 2, Lines 49-51: The response strategy should also consider the potential for use of surface and subsea dispersants, <i>in situ</i> burning, mechanical recovery, wildlife protection, rescue and rehabilitation strategies and real-time response capability.</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III

Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans		Review Completed
<p>30 CFR §254 Subpart B: Oil Spill Response Plans (OSRPs) for Outer Continental Shelf (OCS) Facilities</p> <p><i>areas identified by your trajectory analysis. The strategies that you will use for their protection must also be stated. At a minimum, this list must include those resources of special economic and environmental importance, if any, specified in the appropriate ACP(s).</i></p>	<p>(d) A discussion of your response to your WCD scenario in adverse weather conditions. This discussion must include:</p> <p>(1) A description of the response equipment that will be used to contain and recover the discharge to the maximum extent practicable. This description must include the types, location(s) and owner, quantity, and capabilities of the equipment. You also must include the effective daily recovery capacities, where applicable. You must calculate the effective daily recovery capacities using the methods described in §254.44. For operations at a drilling or production facility, your scenario must show how you will cope with the initial spill volume upon arrival at the scene and then support operations for a blowout lasting 30 days.</p>	<p>Comments:</p>
<p>30 CFR §254.26 What information must be included in the "WCD Scenario" Appendix?</p>	<p>Page 2, Lines 81-83: Clarify that BSEE will evaluate the description of the OSRP WCD scenario response strategy by carefully weighing all factors addressed in §254.26 to determine if the strategy is sufficient to contain and recover the discharge to the maximum extent practicable.</p> <p>Page 2, Lines 83-89: These factors include the total effective daily recovery capacity (EDRC) as calculated in accordance with §254.44(a) and the suitability of equipment within the limits of current technology as required in §254.26(e). BSEE review of OSRPs is necessarily informed by information obtained during the Deepwater Horizon oil spill response, during which the total EDRC calculated for all equipment listed in the OSRP overestimated the amount of oil that could be removed from the water.</p> <p>Page 3, Lines 90-95: BSEE review of OSRPs is not limited to assessing whether the calculated EDRC for the listed mechanical equipment equals the WCD volume. A fully developed response strategy includes a list of all dedicated recovery equipment and the operating characteristics of the systems associated with each skimmer. The plan should demonstrate the ability to contain and recover the WCD to the maximum extent practicable based on the descriptions of the response equipment and other available response elements functioning together.</p> <p>Page 31: Appendix H. WCD Scenarios (30 CFR §254.3(c)(4) and 30 CFR §254.26)</p> <p><input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III</p>	

30 CFR §254 Subpart B: Oil Spill Response Plans (OSRPs) for Outer Continental Shelf (OCS) Facilities	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
<p>(2) A description of the personnel, materials, and support vessels that would be necessary to ensure that the identified response equipment is deployed and operated promptly and effectively. Your description must include the location and owner of these resources as well as the quantities and types (if applicable).</p> <p>(3) A description of your oil storage, transfer, and disposal equipment. Your description must include the types, location and owner, quantity, and capacities of the equipment.</p>	<p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
<p>30 CFR §254.26 What information must be included in the "WCD Scenario" Appendix?</p> <p>(4) An estimation of the individual times needed for:</p> <p>(i) Procurement of the identified containment, recovery, and storage equipment</p> <p>(ii) Procurement of equipment transportation vessel(s)</p> <p>(iii) Procurement of personnel to load and operate the equipment</p> <p>(iv) Equipment loadout [transfer of equipment to transportation vessel(s)];</p> <p>(v) Travel to the deployment site (including any time required for travel from an equipment storage area)</p> <p>(vi) Equipment deployment</p>	<p>Page 32: Appendix H. WCD Scenarios (30 CFR §254.3(c)(4) and 30 CFR §254.26)</p> <p>Comments:</p>	

30 CFR §254 Subpart B: Oil Spill Response Plans (OSRPs) for Outer Continental Shelf (OCS) Facilities	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
<p><i>(e) In preparing the discussion required by paragraph (d) of this section, you must:</i></p> <p>(1) Ensure that the response equipment, materials, support vessels, and strategies listed are suitable within the limits of current technology for the range of environmental conditions anticipated at your facility.</p> <p>(2) Use standardized, defined terms to describe the range of environmental conditions anticipated and the capabilities of response equipment. Examples of acceptable terms include those defined in American Society for Testing of Materials (ASTM) publication F625-94, Standard Practice for Describing Environmental Conditions Relevant to Spill Control Systems for Use on Water, and ASTM F818-93, Standard Definitions Relating to Spill Response Barriers.</p>	<p>Page 3, Lines 95-101: BSEE encourages the use of new technology and response systems that will increase the effectiveness of mechanical recovery tactics. OSRPs should be prepared by first developing a strategy that would respond to the WCD to the maximum extent practicable, then identifying the resources that would be required to implement the strategy, and finally identifying equipment (including mechanical recovery equipment) and logistics that would meet those resource requirements.</p> <p>Page 32: Appendix H. WCD Scenarios (30 CFR §254.3(c)(4) and 30 CFR §254.26)</p> <p>Comments:</p>	<p><input type="checkbox"/> P-I</p> <p><input type="checkbox"/> P-II</p> <p><input type="checkbox"/> P-III</p>

<p>30 CFR §254 Subpart B: Oil Spill Response Plans (OSRPs) for Outer Continental Shelf (OCS) Facilities</p>	<p>Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans</p>	<p>Page 16: Section 18. Dispersant Use Plan (30 CFR §254.23(g)(9) and §254.27) The following are examples of what you should include in your dispersant use plan:</p> <ul style="list-style-type: none"> i. The dispersants listed in your inventory that are specifically for subsea use. ii. A discussion of your assumptions on dispersant effectiveness over time. iii. Your planned dispersant application rates. iv. A discussion of any preapproval process for product use. Include copies of the applicable up-to-date Regional Response Team (RRT) documents for the approval process. v. If applicable, describe your understanding and applicability of guidance from the National Response Team (NRT) or appropriate RRT on the use of subsea dispersants, including the process for approval, and any required monitoring protocols to be implemented concurrently with subsea dispersant application. Include information about the use of subsea and vessel dispersant application as a method to reduce exposure to volatile organic chemicals (VOCs) and allow vertical access during well control and containment activities. 	<p>Review Completed</p>
<p><i>Your dispersant use plan must be consistent with the National Contingency Plan Product Schedule and other provisions of the National Contingency Plan (NCP) and the appropriate ACP(s). The plan must include:</i></p> <ul style="list-style-type: none"> (a) An inventory and a location of the dispersants and other chemical or biological products that you might use on the oils handled, stored, or transported at the facility (b) A summary of toxicity data for these products (c) A description and location of any application equipment required as well as an estimate of the time to commence application after approval is obtained (d) A discussion of the application procedures (e) A discussion of the conditions under which the product use may be requested (f) An outline of the procedures to be followed in obtaining approval for product use. 	<p>Comments:</p>		
<p>30 CFR §254.27 What information must be included in the "Dispersant Use Plan" Appendix?</p>			

<p>30 CFR §254 Subpart B: Oil Spill Response Plans (OSRPs) for Outer Continental Shelf (OCS) Facilities</p> <p><i>The in situ burning plan must be consistent with any guidelines authorized by the NCP and the appropriate ACP(s). The in situ burning plan must include:</i></p> <p>(a) <i>A description of the in situ burn equipment including its availability, location, and owner</i></p> <p>(b) <i>A discussion of the in situ burning procedures, including provisions for ignition of an oil spill</i></p> <p>(c) <i>A discussion of environmental effects of an in situ burn</i></p> <p>(d) <i>Your guidelines for well control and safety of personnel and property</i></p> <p>(e) <i>A discussion of the circumstances in which in situ burning may be appropriate</i></p> <p>(f) <i>Your guidelines for making the decision to ignite</i></p> <p>(g) <i>An outline of the procedures to be followed to obtain approval for an in situ burn</i></p>	<p>Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans</p> <p>Page 17, In-Situ Burning Plan (30 CFR 254.23(g)(9) and 30 CFR 254.28)</p> <p>Provide your <i>in-situ</i> burning plan. Ensure that your <i>in-situ</i> burning plan is consistent with any guidance from the NCP and the appropriate ACP(s). Include the following information in your <i>in-situ</i> burning plan:</p> <p>a. <i>In-Situ Burn Equipment</i> – A description of the <i>in-situ</i> burn equipment, including its availability, location, and owner. BSEE encourages you to describe the operational service life of this burn equipment. BSEE also encourages you to discuss procedures for maintaining <i>in-situ</i> burn equipment necessary to support a response to a spill that extends more than 30 days.</p> <p>b. <i>Procedures</i> – A discussion of your <i>in-situ</i> burning procedures, including provisions for igniting an oil spill.</p> <p>c. <i>Environmental Effects</i> – A discussion of environmental effects of an <i>in-situ</i> burn.</p> <p>d. <i>Safety Provisions</i> – Your guidelines for ensuring personnel and property safety during an <i>in-situ</i> burn.</p> <p>e. <i>Conditions for Use</i> – A discussion of the circumstances in which <i>in-situ</i> burning may be appropriate.</p> <p>f. <i>Decision Processes</i> – Your guidelines for making the decision to ignite.</p> <p>g. <i>Approval Procedures and Documents</i> – An outline of the procedures you will follow to obtain approval for an <i>in-situ</i> burn. It is recommended that you include a discussion of any preapproval process and copies of the applicable up-to-date RRT documents that you will use in the approval process.</p>	<p>Review Completed</p> <p><input type="checkbox"/> P-I</p> <p><input type="checkbox"/> P-II</p>
<p>30 CFR §254.28 What information must be included in the "In Situ Burning Plan" Appendix?</p>	<p>Comments:</p>	

<p>30 CFR §254 Subpart B: Oil Spill Response Plans (OSRPs) for Outer Continental Shelf (OCS) Facilities</p>	<p>Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans</p>	<p>Review Completed</p>
<p>30 CFR §254.29 What information must be included in the "Training and Drills" Appendix?</p> <p>The "Training and Drills" appendix must:</p> <p>(a) Identify and include the dates of the training provided to members of the spill response management team and the QI. The types of training given to the members of the spill response operating team also must be described. The training requirements for your spill management team and your spill response operating team are specified in 30 CFR §254.41. You must designate a location where you keep course completion certificates or attendance records for this training.</p> <p>(b) Describe in detail your plans for satisfying the exercise requirements of 30 CFR §254.42. You must designate a location where you keep the records of these exercises.</p>	<p>Page 25: Appendix B. Training Information (30 CFR §254.29)</p> <p>Comments:</p>	<p><input type="checkbox"/> P-I</p> <p><input type="checkbox"/> P-II</p> <p><input type="checkbox"/> P-III</p>
<p>30 CFR §254.30 When must I revise my response plan? (Not included here, revision compliance documented via Docket Control Coversheet)</p>		

OSPD Tracking Number:	OSRP Name:	
30 CFR §254 Subpart C: Related Requirements for Outer Continental Shelf (OCS) Facilities	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
§254.40 Records. (Not included here, not applicable to plan review)		
§254.41 Training your response personnel. (Not included here, not applicable to plan review)		
30 CFR §254.42 Exercises for response personnel and equipment	<p>(a) <i>You must conduct an exercise of your entire response plan at least once every 3 years (triennial exercise). You may satisfy this requirement by conducting separate exercises for individual parts of the plan over the 3-year period; you do not have to conduct an exercise of your entire response plan at one time.</i></p>	<p>Not Specifically Addressed by NTL</p> <p><input type="checkbox"/> P-I <input type="checkbox"/> P-II</p> <p>Comments: <i>(Reviewer shall utilize Triennial Exercise Cycle Compliance Worksheet to assist in compliance determination.)</i></p>
30 CFR §254.42 Exercises for response personnel and equipment	<p>(b) <i>All records of spill response exercises must be maintained for the complete 3-year exercise cycle. Records should be maintained at the facility or at a corporate location designated in the plan. Records showing that oil spill removal organizations (OSROs) and oil spill removal cooperatives have deployed each type of equipment also must be maintained for the 3-year cycle.</i></p>	<p>Not Specifically Addressed by NTL</p> <p><input type="checkbox"/> P-I <input type="checkbox"/> P-II</p> <p>Comments:</p>

<p>30 CFR §254 Subpart C: Related Requirements for Outer Continental Shelf (OCS) Facilities</p>	<p>Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans</p>	<p>Review Completed</p>
<p>§254.43 Maintenance and periodic inspection of response equipment. (Not included here, not applicable to plan review)</p>		
<p>30 CFR §254.44 Calculating response equipment effective daily recovery capacity (EDRC)</p>	<p>(a) You are required by §254.26(d)(1) to calculate the effective daily recovery capacity of the response equipment identified in your response plan that would be used to contain and recover your worst case discharge (WCD). You must calculate the EDRC of the equipment by multiplying the manufacturer's rated throughput capacity over a 24-hour period by 20 percent. This 20 percent efficiency factor takes into account the limitations of the recovery operations due to available daylight, sea state, temperature, viscosity, and emulsification of the oil being recovered. You must use this calculated rate to determine if you have sufficient recovery capacity to respond to your WCD scenario.</p> <p>(b) If you want to use a different efficiency factor for specific oil recovery devices, you must submit evidence to substantiate that efficiency factor. Adequate evidence includes verified performance data measured during actual spills or test data gathered according to the provisions of §254.45(b) and (c).</p>	<p>Not Specifically Addressed by NTL</p> <p><input type="checkbox"/> P-I</p> <p><input type="checkbox"/> P-II</p> <p>Comments:</p>
<p>§254.45 Verifying the capabilities of your response equipment. (Not included here, not applicable to plan review)</p>		
<p>§254.46 Whom do I notify if an oil spill occurs? (Not included here, not applicable to plan review)</p>		

<p>30 CFR §254 Subpart C: Related Requirements for Outer Continental Shelf (OCS) Facilities</p>	<p>Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans</p>	<p>Review Completed</p> <p><input type="checkbox"/> P-I</p> <p><input type="checkbox"/> P-II</p>
<p><i>You must calculate the volume of oil of your WCD scenario as follows:</i></p> <p>(a) <i>For an oil production platform facility, the size of your WCD scenario is the sum of the following:</i></p> <p>(1) <i>The maximum capacity of all oil storage tanks and flow lines on the facility. Flow line volume may be estimated.</i></p> <p>(2) <i>The volume of oil calculated to leak from a break in any pipelines connected to the facility considering shutdown time, the effect of hydrostatic pressure, gravity, frictional wall forces and other factors.</i></p> <p>(3) <i>The daily production volume from an uncontrolled blowout of the highest capacity well associated with the facility. In determining the daily discharge rate, you must consider reservoir characteristics, casing/production tubing sizes, and historical production and reservoir pressure data. As required by §254.26(d)(1), your scenario must discuss how to respond to this well flowing for 30 days.</i></p> <p>(b) <i>For exploratory or development drilling operations, the size of your WCD scenario is the daily volume possible from an uncontrolled blowout. In determining the daily discharge rate, you must consider any known reservoir characteristics. If reservoir characteristics are unknown, you must consider the characteristics of any analog reservoirs from the area and give an explanation for the selection of the reservoir(s) used. As required by §254.26(d)(1), your scenario must discuss how to respond to this well flowing for 30 days.</i></p>	<p>Not Specifically Addressed by NTL</p> <p>Comments: <i>(Reviewer shall utilize Worst Case Discharge Verification Worksheet to assist in compliance determination.)</i></p>	
<p>30 CFR §254.47 Determining the volume of oil of your WCD scenario</p>		

<p>30 CFR §254 Subpart C: Related Requirements for Outer Continental Shelf (OCS) Facilities</p>	<p>Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans</p>	<p>Review Completed</p>
<p>30 CFR §254.47 Determining the volume of oil of your WCD scenario</p> <p><i>(c) For a pipeline facility, the size of your WCD scenario is the volume possible from a pipeline break. You must calculate this volume as follows:</i></p> <p>(1) Add the pipeline system leak detection time to the shutdown response time.</p> <p>(2) Multiply the time calculated in paragraph (c)(1) of this section by the highest measured oil flow rate over the preceding 12-month period. For new pipelines, you should use the predicted oil flow rate in the calculation.</p> <p>(3) Add to the volume calculated in paragraph (c)(2) of this section the total volume of oil that would leak from the pipeline after it is shut in. Calculate this volume by taking into account the effects of hydrostatic pressure, gravity, frictional wall forces, length of pipeline segment, tie-ins with other pipelines, and other factors.</p> <p>(d) If your facility which stores, handles, transfers, processes, or transports oil does not fall into the categories listed in paragraph (a), (b), or (c) of this section, contact the Regional Supervisor for instructions on the calculation of the volume of your WCD scenario.</p>	<p>Not Specifically Addressed by NTL</p> <p><input type="checkbox"/> P-I <input type="checkbox"/> P-II</p>	
<p>Comments: (Reviewer shall utilize Worst Case Discharge Verification Worksheet to assist in compliance determination.)</p>		

OSPD Tracking Number:		OSRP Name:	
<p>30 CFR §254 Subpart D: Oil Spill Response Requirements for Facilities Located in State Waters Seaward of the Coastline</p>		<p>Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans</p>	
<p>30 CFR §254.50 Spill response plans for facilities located in State Waters seaward of the coastline</p>	<p><i>O/o/s of facilities located in State Waters seaward of the coastline must submit a spill response plan to the Bureau of Safety and Environmental Enforcement (BSEE) for approval. You may choose one of three methods to comply with this requirement. The three methods are described in §254.51, §254.52, and §254.53.</i></p>	<p>Not Specifically Addressed by NTL</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>30 CFR §254.51 Modifying an existing Outer Continental Shelf (OCS) response plan</p>		<p>OSRP Submission Considerations Page 2 Paragraph 2: You are encouraged to choose the option to modify an existing regional OSRP and include facilities in State offshore waters seaward of the coastline.</p>	
<p>30 CFR §254.52 Following the format for an OCS response plan</p>		<p>Not Specifically Addressed by NTL</p>	
<p>Comments:</p>		<p>Comments:</p>	

30 CFR §254 Subpart D: Oil Spill Response Requirements for Facilities Located in State Waters Seaward of the Coastline	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
<p>(a) You may submit a response plan to BSEE for approval that was developed in accordance with the laws or regulations of the appropriate State. The plan must contain all the elements the State and OPA require and must:</p> <p>(1) Be consistent with the requirements of the National Contingency Plan and appropriate Area Contingency Plan(s).</p> <p>(2) Identify a qualified individual and require immediate communication between that person and appropriate Federal officials and response personnel if there is a spill.</p>	<p>Not Specifically Addressed by NTL</p> <p>Comments: (Reviewer shall utilize ACP Consistency Evaluation Worksheet to assist in compliance determination.)</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>(3) Identify any private personnel and equipment necessary to remove, to the maximum extent practicable, a worst case discharge as defined in §254.47. The plan must provide proof of contractual services or other evidence of a contractual agreement with any oil spill response organizations or spill management team members who are not employees of the owner or operator.</p>	<p>Not Specifically Addressed by NTL</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>(4) Describe the training, equipment testing, periodic unannounced drills, and response actions of personnel at the facility. These must ensure both the safety of the facility and the mitigation or prevention of a discharge or the substantial threat of a discharge.</p>	<p>Not Specifically Addressed by NTL</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II

30 CFR §254.53 Submitting a response plan developed under State requirements

30 CFR §254 Subpart D: Oil Spill Response Requirements for Facilities Located in State Waters Seaward of the Coastline	Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
	<p>Not Specifically Addressed by NTL</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>(5) Describe the procedures you will use to periodically update and resubmit the plan for approval of each significant change.</p>	<p>Not Specifically Addressed by NTL</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>(b) Your plan developed under State requirements also must include the following information: (1) A list of the facilities and leases the plan covers and a map showing their location</p>	<p>Not Specifically Addressed by NTL</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>(2) A list of the types of oil handled, stored, or transported at the facility</p>	<p>Not Specifically Addressed by NTL</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>(3) Name and address of the State agency to whom the plan was submitted</p>	<p>Not Specifically Addressed by NTL</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>(4) Date the plan was submitted to the State</p>	<p>Not Specifically Addressed by NTL</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>(5) If the plan received formal approval, the name of the approving organization, the date of approval, and a copy of the State agency's approval letter if one was issued</p>	<p>Not Specifically Addressed by NTL</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II
<p>(6) Identification of any regulations or standards used in preparing the plan</p>	<p>Not Specifically Addressed by NTL</p> <p>Comments:</p>	<input type="checkbox"/> P-I <input type="checkbox"/> P-II

<p>30 CFR §254 Subpart D: Oil Spill Response Requirements for Facilities Located in State Waters Seaward of the Coastline</p>	<p>Notice to Lessees # 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans</p>	<p>Review Completed</p>
<p><i>You may reference information contained in other readily accessible documents in your response plan. Examples of documents that you may reference are the National Contingency Plan (NCP), Area Contingency Plan (ACP), BSEE, or Bureau of Ocean Energy Management environmental documents, and Oil Spill Removal Organization (OSRO) documents that are readily accessible to the Regional Supervisor. You must ensure that the Regional Supervisor possesses or is provided with copies of all OSRO documents you reference. You should contact the Regional Supervisor if you want to know whether a reference is acceptable.</i></p>	<p>Page 18, Section 22. Prevention Measures for Facilities Located in State Waters (30 CFR §254.54)</p> <p>If your OSRP covers facilities in State Waters:</p> <p>a. Describe the steps you are taking to prevent oil spills or to mitigate the substantial threat of such a discharge.</p> <p>b. Identify all state or Federal safety or pollution prevention requirements that apply to the prevention of oil spills from the facilities and demonstrate your compliance with these requirements.</p> <p>c. Describe the industry safety and pollution prevention standards the facilities meet.</p> <p>Comments:</p>	<p><input type="checkbox"/> P-I</p> <p><input type="checkbox"/> P-II</p> <p><input type="checkbox"/> P-III</p>

OSPD Tracking Number:		OSRP Name:	
30 CFR §254		Notice to Lessees No. 2012-N06 : Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	
Applicable 30 CFR §254 Cite:		<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III	
Applicable NTL Section:		<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III	
Comments:			
Additional Comment Page 1, Box 1		Additional Comment Page 1, Box 2	
Applicable 30 CFR §254 Cite:		<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III	
Applicable NTL Section:		<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III	
Comments:			

Additional Comment Page 2, Box 3	Applicable 30 CFR §254 Cite:	<p>Applicable NTL Section:</p> <input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III
Additional Comment Page 2, Box 4	Applicable 30 CFR §254 Cite:	<p>Applicable NTL Section:</p> <input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III

OIL SPILL RESPONSE PLAN: DOCKET CONTROL COVER SHEET

Docket #:		OSRP Name:					Page:	
<input type="checkbox"/> WCD Certification?	Date Accepted:	Date Expires:		30(a) Grid:				
Initial OSRP Approval Date:		OSPD Tracking No.:						
OSRP Revision Compliance Block			OSPD Tracking #:					
30(a) Review Requirement		30(b) Revisions for Approval		OSPD Required Revisions		Referenced OSPD Tracking #:		
<input type="checkbox"/> 30(a) Received Date:		<input type="checkbox"/> 30(b)(1)	<input type="checkbox"/> 30(b)(2)	<input type="checkbox"/> 30(c)	<input type="checkbox"/> 30(d) and 30(e)(1)			
<input type="checkbox"/> Phase I Conducted Date:		<input type="checkbox"/> 30(b)(3)	<input type="checkbox"/> 30(b)(4)		<input type="checkbox"/> 30(e)(2)	<input type="checkbox"/> 30(e)(3)		
30(a) Revision Submittal Compliant? Y / N 30(b) Revision Submittal Approved? Y / N		Additional OSRP Review activity information:				Completed		
Compliance Notification Date: ENF Activity Code:						Target Date	Actual Date	
Note: 30(a) submissions shall only generate an OSPD Tracking number when an OSRP review activity is initiated. Only one OSPD Tracking number per revision compliance block.	Phase II: Preliminary Review <input type="checkbox"/> Full <input type="checkbox"/> Partial <input type="checkbox"/> Targeted		Conducted by:					
			Reviewed by:					
	Phase III: Preparedness Review <input type="checkbox"/> Full <input type="checkbox"/> Partial <input type="checkbox"/> Targeted		Conducted by:					
			Reviewed by:					
OSRP Revision Compliance Block			OSPD Tracking #:					
30(a) Review Requirement		30(b) Revisions for Approval		OSPD Required Revisions		Referenced OSPD Tracking #:		
<input type="checkbox"/> 30(a) Received Date:		<input type="checkbox"/> 30(b)(1)	<input type="checkbox"/> 30(b)(2)	<input type="checkbox"/> 30(c)	<input type="checkbox"/> 30(d) and 30(e)(1)			
<input type="checkbox"/> Phase I Conducted Date:		<input type="checkbox"/> 30(b)(3)	<input type="checkbox"/> 30(b)(4)		<input type="checkbox"/> 30(e)(3)	<input type="checkbox"/> 30(e)(2)		
30(a) Revision Submittal Compliant? Y / N 30(b) Revision Submittal Approved? Y / N		Additional OSRP Review activity information:				Completed		
Compliance Notification Date: ENF Activity Code:						Target Date	Actual Date	
Note: 30(a) submissions shall only generate an OSPD Tracking number when an OSRP review activity is initiated. Only one OSPD Tracking number per revision compliance block.	Phase II: Preliminary Review <input type="checkbox"/> Full <input type="checkbox"/> Partial <input type="checkbox"/> Targeted		Conducted by:					
			Reviewed by:					
	Phase III: Preparedness Review <input type="checkbox"/> Full <input type="checkbox"/> Partial <input type="checkbox"/> Targeted		Conducted by:					
			Reviewed by:					
OSRP Revision Compliance Block			OSPD Tracking #:					
30(a) Review Requirement		30(b) Revisions for Approval		OSPD Required Revisions		Referenced OSPD Tracking #:		
<input type="checkbox"/> 30(a) Received Date:		<input type="checkbox"/> 30(b)(1)	<input type="checkbox"/> 30(b)(2)	<input type="checkbox"/> 30(c)	<input type="checkbox"/> 30(d) and 30(e)(1)			
<input type="checkbox"/> Phase I Conducted Date:		<input type="checkbox"/> 30(b)(3)	<input type="checkbox"/> 30(b)(4)		<input type="checkbox"/> 30(e)(3)	<input type="checkbox"/> 30(e)(2)		
30(a) Revision Submittal Compliant? Y / N 30(b) Revision Submittal Approved? Y / N		Additional OSRP Review activity information:				Completed		
Compliance Notification Date: ENF Activity Code:						Target Date	Actual Date	
Note: 30(a) submissions shall only generate an OSPD Tracking number when an OSRP review activity is initiated. Only one OSPD Tracking number per revision compliance block.	Phase II: Preliminary Review <input type="checkbox"/> Full <input type="checkbox"/> Partial <input type="checkbox"/> Targeted		Conducted by:					
			Reviewed by:					
	Phase III: Preparedness Review <input type="checkbox"/> Full <input type="checkbox"/> Partial <input type="checkbox"/> Targeted		Conducted by:					
			Reviewed by:					
OSRP Revision Compliance Block			OSPD Tracking #:					
30(a) Review Requirement		30(b) Revisions for Approval		OSPD Required Revisions		Referenced OSPD Tracking #:		
<input type="checkbox"/> 30(a) Received Date:		<input type="checkbox"/> 30(b)(1)	<input type="checkbox"/> 30(b)(2)	<input type="checkbox"/> 30(c)	<input type="checkbox"/> 30(d) and 30(e)(1)			
<input type="checkbox"/> Phase I Conducted Date:		<input type="checkbox"/> 30(b)(3)	<input type="checkbox"/> 30(b)(4)		<input type="checkbox"/> 30(e)(3)	<input type="checkbox"/> 30(e)(2)		
30(a) Revision Submittal Compliant? Y / N 30(b) Revision Submittal Approved? Y / N		Additional OSRP Review activity information:				Completed		
Compliance Notification Date: ENF Activity Code:						Target Date	Actual Date	
Note: 30(a) submissions shall only generate an OSPD Tracking number when an OSRP review activity is initiated. Only one OSPD Tracking number per revision compliance block.	Phase II: Preliminary Review <input type="checkbox"/> Full <input type="checkbox"/> Partial <input type="checkbox"/> Targeted		Conducted by:					
			Reviewed by:					
	Phase III: Preparedness Review <input type="checkbox"/> Full <input type="checkbox"/> Partial <input type="checkbox"/> Targeted		Conducted by:					
			Reviewed by:					

Worst Cast Discharge Verification: Certification and Oil Spill Response Plan Worksheet	OSPD Tracking Number:		WCD Scenario No. ____ of ____	
	OSRP Name:		WCD Scenario ID:	Facility Name/ID:
Instructions: OSPD Preparedness Analysts should utilize this form when conducting a WCD Certification or OSRP review in order to verify the WCD calculations provided by the plan holder. Each form should identify whether the WCD is for certification prior to an approved OSRP or part of the OSRP review process. Also, only one WCD scenario may be verified per worksheet and any unused portions of the form shall be lined out with reviewer initials and date.			Area:	Block:
			API:	Miles to Shore:
<input type="checkbox"/> 30 CFR §254.2(b) WCD Certification (Blocks 1 & 2)		<input type="checkbox"/> OSRP Review, non-WCD Certification (Blocks 1, 3 & 4)		

BLOCK 1: WCD Verification		30 CFR §254.47 Determining the volume of oil of your worst case discharge scenario.			
(a) For an oil production platform facility, the size of your WCD scenario is the sum of the following:	(1) The maximum capacity of all oil storage tanks and flow lines on the facility. Flow line volume may be estimated	(2) The volume of oil calculated to leak from a break in any pipelines connected to the facility considering shutdown time, the effect of hydrostatic pressure, gravity, frictional wall forces, and other factors	(3) The daily production volume from an uncontrolled blowout of the highest capacity well associated with the facility. In determining the daily discharge rate, you must consider reservoir characteristics, casing/production tubing sizes, and historical production and reservoir pressure data.	WCD Volume:	As required by §254.26(d)(1), your scenario must discuss how to respond to this well flowing for 30 days.
	Volume: (Page ____)	+ Volume: (Page ____)	+ Volume: (Page ____)		

(b) For exploratory or development drilling operations, the size of your WCD scenario...	...is the daily volume possible from an uncontrolled blowout. In determining the daily discharge rate, you must consider any known reservoir characteristics. If reservoir characteristics are unknown, you must consider the characteristics of any analog reservoirs from the area and give an explanation for the selection of the reservoir(s) used.			WCD Volume:	As required by §254.26(d)(1), your scenario must discuss how to respond to this well flowing for 30 days.
	Volume:	(Identify page numbers of explanation, if provided.)			

(c) For a pipeline facility, the size of your WCD scenario is the volume possible from a pipeline break. You must calculate this volume as follows:	(1) Add the pipeline system leak detection time to the shutdown response time.	(2) Multiply the time calculated in paragraph (c)(1) of this section by the highest measured oil flow rate over the preceding 12-month period. For new pipelines, you should use the predicted oil flow rate in the calculation.	(3) Add to the volume calculated in paragraph (c)(2) of this section the total volume of oil that would leak from the pipeline after it is shut in. Calculate this volume by taking into account the effects of hydrostatic pressure, gravity, frictional wall forces, length of pipeline segment, tie-ins with other pipelines, and other factors.	WCD Volume:
	Time: (Page ____)	x Flow rate: (Page ____)	+ Volume (Page ____)	

(d) If your facility that stores, handles, transfers, processes, or transports oil does not fall into the categories listed in paragraph (a), (b), or (c) of this section, contact the Regional Supervisor for instructions on the calculation of the volume of your WCD scenario.		
BSEE Instructions Received Date:	List assumptions/calculations:	WCD Volume:

BLOCK 2: WCD Certification		The certification must show that you have ensured by contract, or other means approved by the Regional Supervisor, the availability of private personnel and equipment necessary to respond to the discharge.	Verification from the organization(s) providing the personnel and equipment must accompany the certification.	BSEE will not allow you to operate a facility for more than 2 years without an approved plan.	WCD Certification Status: <input type="checkbox"/> Accepted <input type="checkbox"/> Not Accepted <input type="checkbox"/> Incomplete
§254.2(b) To operate a facility without an approved plan, you must...	...certify in writing to the Regional Supervisor that you have the capability to respond, to the maximum extent practicable, to a WCD or a substantial threat of such a discharge.				
<input type="checkbox"/> Verified	<input type="checkbox"/> Verified	<input type="checkbox"/> Verified	<input type="checkbox"/> Verified		

Block 3: WCD Compliance Checklist (§254.26: What information must I include in the "WCD Scenario" Appendix?)				Block 4: WCD Guidance Checklist Notice to Lessees 2012-N06: Appendix H. WCD Scenarios				Key: V=Verified I=Incomplete C=Comment Included							
§254.26	Review			§254.26	Review			Appendix H	Review			Appendix H	Review		
	V	I	C		V	I	C		V	I	C		V	I	C
(a)				(d)(4)(ii)				H. (intro)				H.c.ii			
(b)				(d)(4)(iii)				H.a.i				H.c.iii			
(c)				(d)(4)(iv)				H.a.ii				H.c.iv			
(d)				(d)(4)(v)				H.b.i				H.c.v(1)			
(d)(1)				(d)(4)(vi)				H.b.ii				H.c.v(2)			
(d)(2)				(e)(1)				H.b.iii				H.c.v(3)			
(d)(3)				(e)(2)				H.b.iv				H.c.v(4)			
(d)(4)(i)								H.c.i				H.c.v(5)(i)			
Other Comments:															

Area Contingency Plan (ACP) Consistency Evaluation Worksheet		OSPD Tracking Number:	List All External Agency and POC(s):
		OSRP Name:	
30 CFR §254.5(b) <i>The plan must be consistent with the National Contingency Plan and the appropriate ACP(s).</i>		Instructions: This worksheet is designed for one external agency (or multiple agency comments merged into one) to provide comments on the OSRP in order to evaluate and validate OSRP tactical content with the appropriate ACP. Comments should be submitted via the Area Committee and or in conjunction with the US Coast Guard's review.	
ACP Name:		USCG and ACP Committee Chair:	
OSRP to ACP Crosswalk		External Review	
OSRP Table of Contents	Interrelated ACP Information		Comments
Phase III: Preparedness			
Section 1 OSRP Quick Guide	ACP Information Location: Comments:	Summary:	
Section 2 Preface	ACP Information Location: Comments:	Summary:	
a. Table of Contents			
b. Record of Revisions			
c. Cross-Reference Table			
Section 3 Introduction	ACP Information Location: Comments:	Summary:	
a. Companies Covered			
b. Purpose and Use			
c. Type of Facilities			
d. Facility Information Statement			
e. Coverage Area			
f. ACPs			
g. Contract Certification Statement			
Section 4 Organization	ACP Information Location: Comments:	Summary:	
a. Qualified Individual (QI)			
b. Spill Management Team			
c. Spill Response Operating Team			
d. Oil Spill Removal Organizations (OSRO)			
e. Support Services			
Section 5 Spill Response Operations Center and Communications	ACP Information Location: Comments:	Summary:	

Area Contingency Plan (ACP) Consistency Evaluation Worksheet	OSPD Tracking Number:	List All External Agency and POC(s):
	OSRP Name:	
30 CFR §254.5(b) <i>The plan must be consistent with the National Contingency Plan and the appropriate ACP(s).</i>	Instructions: This worksheet is designed for one external agency (or multiple agency comments merged into one) to provide comments on the OSRP in order to evaluate and validate OSRP tactical content with the appropriate ACP. Comments should be submitted via the Area Committee and or in conjunction with the US Coast Guard's review.	
ACP Name:	USCG and ACP Committee Chair:	
OSRP to ACP Crosswalk		External Review
OSRP Table of Contents	Interrelated ACP Information	Comments
Phase III: Preparedness		
a. Spill Response Operations Center		
b. Communications		
Section 6 Spill Detection and Source Identification and Control	ACP Information Location: Comments:	Summary:
a. Spill Detection		
b. Pipeline Spill Detection and Location		
c. Source Control		
Section 7 QI, Spill Response Operating Team (SROT), and OSRO Notifications	ACP Information Location: Comments:	Summary:
a. Reporting Procedures		
b. Company Contact Information		
c. SROT Contact Information		
d. OSRO Contact Information		
e. Subsea Containment Organization Information		
f. Internal Spill Reporting Documents		
Section 8 External Notifications	ACP Information Location: Comments:	Summary:
a. Reporting Procedures		
b. External Contact Information		

Area Contingency Plan (ACP) Consistency Evaluation Worksheet		OSPD Tracking Number:	List All External Agency and POC(s):
		OSRP Name:	
30 CFR §254.5(b) <i>The plan must be consistent with the National Contingency Plan and the appropriate ACP(s).</i>		Instructions: This worksheet is designed for one external agency (or multiple agency comments merged into one) to provide comments on the OSRP in order to evaluate and validate OSRP tactical content with the appropriate ACP. Comments should be submitted via the Area Committee and or in conjunction with the US Coast Guard's review.	
ACP Name:		USCG and ACP Committee Chair:	
OSRP to ACP Crosswalk		External Review	
OSRP Table of Contents		Interrelated ACP Information	
Phase III: Preparedness		Comments	
c. External Spill Reporting Documents			
Section 9 Available Technical Expertise		ACP Information Location: Comments:	Summary:
Section 10 Strategic Response Planning		ACP Information Location: Comments:	Summary:
Section 11 Spill Assessment		ACP Information Location: Comments:	Summary:
a. Locating a Spill			
b. Determining the Size and Volume of a Spill			
c. Predicting Spill Movement			
d. Monitoring and Tracking Spill Movement			

Area Contingency Plan (ACP) Consistency Evaluation Worksheet	OSPD Tracking Number:	List All External Agency and POC(s):
	OSRP Name:	

30 CFR §254.5(b) *The plan must be consistent with the National Contingency Plan and the appropriate ACP(s).* **Instructions:** This worksheet is designed for one external agency (or multiple agency comments merged into one) to provide comments on the OSRP in order to evaluate and validate OSRP tactical content with the appropriate ACP. Comments should be submitted via the Area Committee and or in conjunction with the US Coast Guard's review.

ACP Name:	USCG and ACP Committee Chair:
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OSRP to ACP Crosswalk	External Review
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OSRP Table of Contents	Interrelated ACP Information	Comments
Phase III: Preparedness		
Section 12 Resource Identification and Prioritization for Protection	ACP Information Location: Comments:	Summary:
Section 13 Resource Protection Methods	ACP Information Location: Comments:	Summary:
Section 14 Mobilization and Deployment Methods	ACP Information Location: Comments:	Summary:

Area Contingency Plan (ACP) Consistency Evaluation Worksheet	OSPD Tracking Number:	List All External Agency and POC(s):
	OSRP Name:	

30 CFR §254.5(b) *The plan must be consistent with the National Contingency Plan and the appropriate ACP(s).* **Instructions:** This worksheet is designed for one external agency (or multiple agency comments merged into one) to provide comments on the OSRP in order to evaluate and validate OSRP tactical content with the appropriate ACP. Comments should be submitted via the Area Committee and or in conjunction with the US Coast Guard's review.

ACP Name:	USCG and ACP Committee Chair:
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OSRP to ACP Crosswalk	External Review
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OSRP Table of Contents	Interrelated ACP Information	Comments
Phase III: Preparedness		
Section 15 Oil and Oiled Debris Removal Procedures	ACP Information Location: Comments:	Summary:
a. Offshore Procedures		
b. Shallow Water and Shoreline Procedures		
c. Response Efficiency		
Section 16 Oil and Oiled Debris Disposal Procedures	ACP Information Location: Comments:	Summary:
Section 17 Wildlife Rescue and Rehabilitation Procedures	ACP Information Location: Comments:	Summary:
Section 18 Dispersant Use Plan	ACP Information Location: Comments:	Summary:
a. Dispersants Inventory		

Area Contingency Plan (ACP) Consistency Evaluation Worksheet		OSPD Tracking Number:	List All External Agency and POC(s):
		OSRP Name:	
30 CFR §254.5(b) <i>The plan must be consistent with the National Contingency Plan and the appropriate ACP(s).</i>		Instructions: This worksheet is designed for one external agency (or multiple agency comments merged into one) to provide comments on the OSRP in order to evaluate and validate OSRP tactical content with the appropriate ACP. Comments should be submitted via the Area Committee and or in conjunction with the US Coast Guard's review.	
ACP Name:		USCG and ACP Committee Chair:	
OSRP to ACP Crosswalk		External Review	
OSRP Table of Contents	Interrelated ACP Information	Comments	
Phase III: Preparedness			
b. Toxicity Data			
c. Application Equipment			
d. Application Methods			
e. Conditions for Use			
f. Approval Procedures and Documents			
Section 19 <i>In Situ</i> Burning Plan	ACP Information Location: Comments:	Summary:	
a. <i>In Situ</i> Burning Equipment			
b. Procedures			
c. Environmental Effects			
d. Safety Provisions			
e. Conditions for Use			
f. Decision Processes			
g. Approval Procedures and Documents			

Area Contingency Plan (ACP) Consistency Evaluation Worksheet		OSPD Tracking Number:	List All External Agency and POC(s):
		OSRP Name:	
30 CFR §254.5(b) <i>The plan must be consistent with the National Contingency Plan and the appropriate ACP(s).</i>		Instructions: This worksheet is designed for one external agency (or multiple agency comments merged into one) to provide comments on the OSRP in order to evaluate and validate OSRP tactical content with the appropriate ACP. Comments should be submitted via the Area Committee and or in conjunction with the US Coast Guard's review.	
ACP Name:		USCG and ACP Committee Chair:	
OSRP to ACP Crosswalk		External Review	
OSRP Table of Contents	Interrelated ACP Information	Comments	
Phase III: Preparedness			
Section 20 Other Strategies (optional)	ACP Information Location: Comments:	Summary:	
a. Product Inventory			
b. Toxicity Data			
c. Application Equipment			
d. Application Methods			
e. Conditions for Use			
f. Approval Procedures and Documents Forms			
Section 21 Documentation	ACP Information Location: Comments:	Summary:	

Area Contingency Plan (ACP) Consistency Evaluation Worksheet		OSPD Tracking Number:	List All External Agency and POC(s):
		OSRP Name:	
30 CFR §254.5(b) <i>The plan must be consistent with the National Contingency Plan and the appropriate ACP(s).</i>		Instructions: This worksheet is designed for one external agency (or multiple agency comments merged into one) to provide comments on the OSRP in order to evaluate and validate OSRP tactical content with the appropriate ACP. Comments should be submitted via the Area Committee and or in conjunction with the US Coast Guard's review.	
ACP Name:		USCG and ACP Committee Chair:	
OSRP to ACP Crosswalk		External Review	
OSRP Table of Contents	Interrelated ACP Information		Comments
Phase III: Preparedness			
Section 22 Prevention Measures for Facilities Located in State Waters	ACP Information Location: Comments:	Summary:	
Appendix A. Facility Information	ACP Information Location: Comments:	Summary:	
a. Table 1			
b. Table 2			
c. Table 3			
d. Table 4			
Appendix B. Training Information	ACP Information Location: Comments:	Summary:	

Area Contingency Plan (ACP) Consistency Evaluation Worksheet		OSPD Tracking Number:	List All External Agency and POC(s):
		OSRP Name:	
30 CFR §254.5(b) <i>The plan must be consistent with the National Contingency Plan and the appropriate ACP(s).</i>		Instructions: This worksheet is designed for one external agency (or multiple agency comments merged into one) to provide comments on the OSRP in order to evaluate and validate OSRP tactical content with the appropriate ACP. Comments should be submitted via the Area Committee and or in conjunction with the US Coast Guard's review.	
ACP Name:		USCG and ACP Committee Chair:	
OSRP to ACP Crosswalk		External Review	
OSRP Table of Contents	Interrelated ACP Information	Comments	
Phase III: Preparedness			
Appendix C. Drill Information	ACP Information Location: Comments:	Summary:	
Appendix D. Contractual Agreements	ACP Information Location: Comments:	Summary:	
Appendix E. Response Equipment	ACP Information Location: Comments:	Summary:	
a. Spill Response Equipment Inventory			
b. Inspection and Maintenance Programs			

Area Contingency Plan (ACP) Consistency Evaluation Worksheet		OSPD Tracking Number:	List All External Agency and POC(s):
		OSRP Name:	
30 CFR §254.5(b) <i>The plan must be consistent with the National Contingency Plan and the appropriate ACP(s).</i>		Instructions: This worksheet is designed for one external agency (or multiple agency comments merged into one) to provide comments on the OSRP in order to evaluate and validate OSRP tactical content with the appropriate ACP. Comments should be submitted via the Area Committee and or in conjunction with the US Coast Guard's review.	
ACP Name:		USCG and ACP Committee Chair:	
OSRP to ACP Crosswalk		External Review	
OSRP Table of Contents		Interrelated ACP Information	
Phase III: Preparedness		Comments	
Appendix F. Support Services and Supplies		ACP Information Location: Comments:	Summary:
Appendix G. Incident Command System – Compliant Notification and Reporting		ACP Information Location: Comments:	Summary:
a. Internal Spill Reporting			
b. External Spill Reporting			
Appendix H. Worst Case Discharge (WCD) Scenarios		ACP Information Location: Comments:	Summary:
a. Determination of Volume for WCD Scenarios			
b. Choice of WCD Scenarios To Include in Your OSRP			
c. WCD Scenario Discussion			
Appendix I Subsea Containment Information		ACP Information Location: Comments:	Summary:

Area Contingency Plan (ACP) Consistency Evaluation Worksheet		OSP Tracking Number:	List All External Agency and POC(s):
		OSRP Name:	
30 CFR §254.5(b) <i>The plan must be consistent with the National Contingency Plan and the appropriate ACP(s).</i>		Instructions: This worksheet is designed for one external agency (or multiple agency comments merged into one) to provide comments on the OSRP in order to evaluate and validate OSRP tactical content with the appropriate ACP. Comments should be submitted via the Area Committee and or in conjunction with the US Coast Guard's review.	
ACP Name:		USCG and ACP Committee Chair:	
OSRP to ACP Crosswalk		External Review	
OSRP Table of Contents		Interrelated ACP Information	
Phase III: Preparedness		Comments	
a. Organizations			
b. Coordination			
c. Materials, Supplies, and Equipment			
d. Contractual Agreements			
e. Operating Team			
f. Equipment Inventory			
Appendix J Oceanographic and Meteorological Information		Summary:	
a. Oceanographic Information			
b. Meteorological Information			

Area Contingency Plan (ACP) Consistency Evaluation Worksheet		OSPD Tracking Number:	List All External Agency and POC(s):
		OSRP Name:	
30 CFR §254.5(b) <i>The plan must be consistent with the National Contingency Plan and the appropriate ACP(s).</i>		Instructions: This worksheet is designed for one external agency (or multiple agency comments merged into one) to provide comments on the OSRP in order to evaluate and validate OSRP tactical content with the appropriate ACP. Comments should be submitted via the Area Committee and or in conjunction with the US Coast Guard's review.	
ACP Name:		USCG and ACP Committee Chair:	
OSRP to ACP Crosswalk		External Review	
OSRP Table of Contents	Interrelated ACP Information		Comments
Phase III: Preparedness			
Appendix K Bibliography	ACP Information Location: Comments:	Summary:	

Oil Spill Response Plan (OSRP) Reviewers' Quick Reference Guide

OSRP Reviewers: This does not replace the full directions and process descriptions found within the Oil Spill Preparedness Division (OSPD) Manual.

	OSRP Review Scope: (Phase II and III only)
Phase I Completeness Review: First stage of OSRP review process (review queue) that looks to verify that the OSRP submitted has all of the component parts before it is submitted into the review queue.	Full: An OSRP review that requires the entire document to be examined and evaluated.
Phase II Preliminary Review: Second stage of OSRP review that seeks to verify that the plan holder has met all the requirements found in 30 CFR §254 only.	Partial: A less than full OSRP review that requires certain sections or distinct aspects of the plan to be examined and evaluated, but does not require a full review to determine plan holder preparedness compliance.
Phase III Preparedness Review: Third and final stage of OSRP review that seeks to verify that the plan holder has met all the requirements found in 30 CFR §254 and the applicable Notice to Lessees (NTL). This phase requires a comprehensive look at the plan to ensure that the plan holder can respond to the maximum extent practicable.	Targeted: A less than partial OSRP review that requires specific pages or distinct paragraphs of text to be examined and evaluated for consistency, but does not require a partial or full review to determine plan holder preparedness compliance.

Error Types:	OSRP Review Type Concepts			
Technical (T): Incorrect use of terminology or some other specific incorrect issue peculiar to or characteristic of established oil spill preparedness concepts, standards, and/or methodologies	Review Type	Review Terminology	Legal Citation	Reviewer Guidance
	Initial	Initial Review	30 CFR §254 Subpart A	Plan holder determines that OSRP is required.
Change or Update		Not defined by regulation	Avoid using revision process terminology.	
Regulatory (R): Misinterpretation or clear noncompliance of applicable regulatory requirements (does not include NTLs).	Approved	30(a) Review	30 CFR §254.30(a)	Submission is required and should be acknowledged.
		Revisions for Approval	30 CFR §254.30(b)	Plan holder submits required revisions for approval
Preparedness (P): Disregard or misapplication of broader preparedness concepts found within industry standards, guidelines and NTLs (does not include regulations).	Approved	OSPD Required Revisions	30 CFR §254 (c) & (e)	Plan holder is requested to submit revisions to plan.
		The term "modification" shall mean changes to an OSRP related to the 30 CFR §254.30(a) biennial submission requirement. The term "amendment" is not defined by the current version of 30 CFR §254 and therefore shall not be utilized. Once approved, OSRPs are evaluated for compliance in accordance with the 30 CFR §254.30 biennial review and revision requirements. Also, OSRPs are always approved until rescinded.		
Error Qualifiers:	Methodology Unsupported (MU)			
Missing/Incomplete (MI)	Inconsistent (IX)			
Incorrect/False (IF)	Improper Use (IU)			

Instructions for Initial Review	Required Form	Instructions for Approved Plan Review
<i>For more detailed information, refer to the OSRP Review Capability (ORC Section of OSPD Manual) for specific process pathways for each plan review type.</i>		
1. Receive initial OSRP.	Docket Control Cover Sheet	1a. Initiate approved OSRP revision review.
2. Create Docket and OSPD Tracking Number and Case File.		1b. 30(b) revisions must be submitted for approval within 15 days.
3. Conduct Phase I Review.	Master Review Matrix for all applicable Subparts	1c. Phase I Review: <i>Required for 30(a) submission compliance.</i> 1c. Phase I Review: Recommended, but optional for all other reviews.
4a. If Phase I passes, send plan holder receipt notification.		2. Obtain OSRP Docket and create applicable case file.
4b. If Phase I fails, return to plan holder for resubmittal.		2a. Conduct Phase II and III Review.
5. Assign OSRP to Preparedness Analyst.		2b. Complete WCD Verification.
6a. Conduct Phase II and III Review.	WCD Form	2c. Complete POC Verification.
6b. Complete Worst Case Discharge (WCD) Verification.	POC Form	2d. Complete ACP Consistency Analysis.
6c. Complete Points of Contact Verification.	ACP Form	2e. Complete Triennial Exercise Analysis.
6d. Complete Area Contingency Plan (ACP) Consistency Analysis.	TEC Form	2f. Complete External Review and analyze for OSRP compliance.
6e. Fill out Triennial Exercise Analysis (utilize historical data).	Submission Disposition	3. Compile docs within case file and complete review evaluation.
6f. Complete External Review and analyze for OSRP compliance.		4a. If OSRP and revision submitted is compliant; complete case file. 4b. If OSRP and revision submitted is non-compliant, send appropriate revision required notification.
7. Compile and review OSRP evaluation.	Applicable Regulatory Letter	6. Each new revision submitted requires a new case file.
8a. If approved, send notice w/ revision requirements if necessary.		7. Plan holder notification must stipulate whether modifications or revisions submitted are accepted and/or compliant.
8b. If not approved, send notice w/ recommended changes.	Submission Dispo & Matrices	
9. Each re-submission of an initial plan requires a new case-file.		
10. Send approval notification.		

OSPD Tracking Number:	OSRP Name:	Notice to Lessees No. 2012-N06: Guidance Document and Instructions for Preparing Regional Oil Spill Response Plans	Review Completed
30 CFR §254	Applicable NTL Section:	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III	
Additional Comment Page 1, Box 1	Comments:		
Additional Comment Page 1, Box 2	Applicable NTL Section:	<input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III	
	Comments		

Additional Comment Page 2, Box 3	Applicable 30 CFR §254 Cite:	<p>Applicable NTL Section:</p> <input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III	<p>Comments:</p>
Additional Comment Page 2, Box 4	Applicable 30 CFR §254 Cite:	<p>Applicable NTL Section:</p> <input type="checkbox"/> P-I <input type="checkbox"/> P-II <input type="checkbox"/> P-III	<p>Comments:</p>

Rescission Control Sheet

Docket #:	OSRP Name:	
OSPD Tracking #:		
Rescind Received Date:	<input type="checkbox"/> Rescind	Date:
	<input type="checkbox"/> Not Rescind	
Conducted by:	Date:	
Reviewed by:	Date:	
Signed by:	Date:	
Comments:		

TEC Capability: Appendix Reference

Appendix R 30 CFR §254 Subpart C to OSPD Manual Crosswalk	R70
Appendix S Triennial Cycle Worksheet.....	S72
Appendix T ICS-214/214a Activity Logs: Unit Log/Individual Log	T73
Appendix U Exercise Compliance Evaluation Form	U76
Appendix V Response Personnel Training Audit.....	V77
Appendix W TEC Control Sheet.....	W78

30 CFR §254 Subpart C to Oil Spill Preparedness Division (OSPD) Manual Crosswalk

SOP ID	Compliance Verification Description
EVC-2 TEC-4	<p>§254.40 Records: You must make all records of services, personnel, and equipment provided by the Oil Spill Removal Organization (OSRO) or cooperatives available to any authorized Bureau of Safety and Environmental Enforcement (BSEE) representatives upon request.</p>
EVC-2 TEC-4	<p>§254.41 Training your response personnel: (a) You must ensure that the members of your spill response operating team who are responsible for operating response equipment attend hands-on training classes at least annually. This training must include the deployment and operation of the response equipment they will use. Those responsible for supervising the team must be trained annually in directing the deployment and use of the response equipment.</p>
	<p>§254.41(b) You must ensure that the Spill Response Management Team, including the spill response coordinator and alternates, receive annual training. This training must include instruction on:</p>
	<p>§254.41(b)(1) Locations, intended use, deployment strategies, and the operational and logistical requirements of response equipment;</p>
TEC-4	<p>§254.41(b)(2) Spill reporting procedures;</p>
	<p>§254.41(b)(3) Oil spill trajectory analysis and predicting spill movement; and</p>
	<p>§254.41(b)(4) Any other responsibilities the spill management team may have.</p>
	<p>§254.41(c) You must ensure that the Qualified Individual (QI) is sufficiently trained to perform his or her duties.</p>
TEC-4 EVC-2	<p>§254.41(d) You must keep all training certificates and training attendance records at the location designated in your response plan for at least 2 years. They must be made available to any authorized BSEE representative upon request.</p>
ORC-1	<p>§254.42 Exercises for your response personnel and equipment: (a) You must exercise your entire response plan at least once every 3 years (triennial exercise). You may satisfy this requirement by conducting separate exercises for individual parts of the plan over the 3-year period; you do not have to exercise your entire response plan at one time.</p>
	<p>§254.42(b) In satisfying the triennial exercise requirement, you must, at a minimum, conduct:</p>
	<p>§254.42(b)(1) An annual spill management team tabletop exercise. The exercise must test the spill management team's organization, communication, and decision making in managing a response. You must not reveal the spill scenario to team members before the exercise starts.</p>
	<p>§254.42(b)(2) An annual deployment exercise of response equipment identified in your plan that is staged at onshore locations. You must deploy and operate each type of equipment in each triennial period. However, it is not necessary to deploy and operate each individual piece of equipment.</p>
TEC-1	<p>§254.42(b)(3) An annual notification exercise for each facility that is manned on a 24-hour basis. The exercise must test the ability of facility personnel to communicate pertinent information in a timely manner to the QI.</p>
	<p>§254.42(b)(4) A semiannual deployment exercise of any response equipment that the BSEE Regional Supervisor requires an owner or operator to maintain at the facility or on dedicated vessels. You must deploy and operate each type of this equipment at least once each year. Each type need not be deployed and operated at each exercise.</p>
	<p>§254.42(c) During your exercises, you must simulate conditions on the area of operations, including seasonal weather variations, to the extent practicable. The exercises must cover a range of scenarios over the 3-year exercise period, simulating response to large continuous spills, spills of short duration and limited volume, and your worst case discharge (WCD) scenario.</p>
TEC-1 TEC-2 TEC-3	<p>§254.42(d) BSEE will recognize and give credit for any documented exercise conducted that satisfies some part of the required triennial exercise. You will receive this credit whether the owner or operator, an OSRO, or a Government regulatory agency initiates the exercise. BSEE will give you credit for an actual spill response if you evaluate the response and generate a proper record. Exercise documentation should include the following information:</p>
	<p>§254.42(d)(1-5) Type of exercise; date and time of the exercise; description of the exercise; objectives met; lessons learned.</p>
	<p>§254.42(e) All records of spill response exercises must be maintained for the complete 3-year exercise cycle. Records should be maintained at the facility or at a corporate location designated in the plan. Records showing that the OSRO and oil spill removal cooperatives have deployed each type of equipment also must be maintained for the 3-year cycle.</p>
TEC-1	<p>§254.42(f) You must inform the Regional Supervisor of the date of any exercise required by paragraph (b)(1), (2), or (4) of this section at least 30 days before the exercise. This will allow BSEE personnel the opportunity to witness any exercises.</p>
TEC-2	<p>§254.42(g) The Regional Supervisor periodically will initiate unannounced drills to test the spill response preparedness of owners and operators.</p>

Subpart C: Related Requirements for Outer Continental Shelf Facilities

OSRP Triennial Exercise Requirements

SOP ID	Compliance Verification Description
All Records Review	All Records Review
Spill Response Operating Team (SROT) Training	Spill Response Operating Team (SROT) Training
SRMT Training	SRMT Training
QI Training	QI Training
Training Records Review	Training Records Review
Oil Spill Response Plan (OSRP) Review	Oil Spill Response Plan (OSRP) Review
SRMT Tabletop Exercise (TTY) Annual Requirement	SRMT Tabletop Exercise (TTY) Annual Requirement
Deployment Exercise Requirement	Deployment Exercise Requirement
Notification and QI Exercise Requirement	Notification and QI Exercise Requirement
Semiannual Dedicated Equipment Deployment Exercise Requirement	Semiannual Dedicated Equipment Deployment Exercise Requirement
Variation of Exercise Simulation and Scenario Requirement	Variation of Exercise Simulation and Scenario Requirement
Exercise Recognition Requirement	Exercise Recognition Requirement
Triennial Exercise Records Retention Requirement	Triennial Exercise Records Retention Requirement
30-Day Exercise Notification Requirement	30-Day Exercise Notification Requirement
Government-Initiated Unannounced Exercise Authority	Government-Initiated Unannounced Exercise Authority

30 CFR §254 Subpart C to Oil Spill Preparedness Division (OSPD) Manual Crosswalk		SOP ID	Compliance Verification Description
<p>§254.42(h) The Regional Supervisor may require changes in the frequency or location of the required exercises, equipment to be deployed and operated, or deployment procedures or strategies. The Regional Supervisor may evaluate the results of the exercises and advise the owner or operator of any needed changes in response equipment, procedures, or strategies.</p> <p>§254.42(i) Compliance with the National Preparedness for Response Exercise Program (PREP) Guidelines will satisfy the exercise requirements of this section. Copies of the PREP document may be obtained from the Regional Supervisor.</p> <p>§254.43 Maintenance and periodic inspection of response equipment (a) You must ensure that the response equipment listed in your response plan is inspected at least monthly and is maintained, as necessary, to ensure optimal performance.</p> <p>§254.43(b) You must ensure that records of the inspections and the maintenance activities are kept for at least 2 years and are made available to any authorized BSEE representative upon request.</p> <p>§254.44 Calculating response equipment effective daily recovery capacities (EDRCs) (a) You are required by §254.26(d)(1) to calculate the EDRC of the response equipment identified in your response plan that you would use to contain and recover your WCD. You must calculate the EDRC of the equipment by multiplying the manufacturer's rated throughput capacity over a 24-hour period by 20 percent. This 20 percent efficiency factor takes into account the limitations of the recovery operations due to available daylight, sea state, temperature, viscosity, and emulsification of the oil being recovered. You must use this calculated rate to determine if you have sufficient recovery capacity to respond to your WCD scenario.</p> <p>§254.44(b) If you want to use a different efficiency factor for specific oil recovery devices, you must submit evidence to substantiate that efficiency factor. Adequate evidence includes verified performance data measured during actual spills or test data gathered according to the provisions of §254.445(b) and (c).</p> <p>§254.45 Verifying the capabilities of your response equipment (a) The Regional Supervisor may require performance testing of any spill response equipment listed in your response plan to verify its capabilities if the equipment:</p> <ul style="list-style-type: none"> §254.45(a)(1) Has been modified; §254.45(a)(2) Has been damaged and repaired; or §254.45(a)(3) Has a claimed EDRC that is inconsistent with data otherwise available to BSEE. <p>§254.45(b) You must conduct any required performance testing of booms in accordance with BSEE-approved test criteria. You must use the document "Test Protocol for the Evaluation of Oil-Spill Containment Booms", available from BSEE, for guidance. Performance testing of skimmers also must be conducted in accordance with BSEE-approved test criteria. You may use the document "Suggested Test Protocol for the Evaluation of Oil Spill Skimmers for the Outer Continental Shelf (OCS)," available from BSEE, for guidance.</p> <p>§254.45(c) You are responsible for any required testing of equipment performance and for the accuracy of the information submitted.</p> <p>§254.46 Whom do I notify if an oil spill occurs? (a) You must immediately notify the National Response Center (1-800-424-8802) if you observe:</p> <ul style="list-style-type: none"> §254.46(a)(1) An oil spill from your facility; §254.46(a)(2) An oil spill from another offshore facility; or §254.46(a)(3) An offshore spill of unknown origin. <p>§254.46(b) In the event of a spill of one barrel or more from your facility, you must orally notify the Regional Supervisor without delay. You also must report spills from your facility of unknown size but thought to be one barrel or more.</p> <p>§254.46(b)(1) If a spill from your facility not originally reported to the Regional Supervisor is subsequently found to be one barrel or more, you must then report it without delay.</p> <p>§254.46(b)(2) You must file a written followup report for any spill from your facility of one barrel or more. The Regional Supervisor must receive this confirmation within 15 days after the spillage has been stopped. All reports must include the cause, location, volume, and remedial action taken. Reports of spills of more than 50 barrels must include information on the sea state, meteorological conditions, and the size and appearance of the slick. The Regional Supervisor may require additional information if it is determined that an analysis of the response is necessary.</p> <p>§254.46(c) If you observe a spill resulting from operations at another offshore facility, you must immediately notify the responsible party and the Regional Supervisor.</p> <p>§254.47(a) thru (d) Determining the volume of oil of your WCD scenario</p>		TEC-1 TEC-2 TEC-3	BSEE Authority To Modify Exercise Requirements
		TEC	NPREP Guidelines Authorized
		EVC-1	Equipment Maintenance and Periodic Inspection Record Review
		ORC-1	Oil Spill Response Plan (OSRP)/Effective Daily Recovery Capacity (EDRC) Review
		EVC-1	Equipment Inspection and Equipment Testing Records Review
		EVC	
		IRC	Spill Reporting and Notification
		ORC-1	OSRP/WCD Review

Subpart C: Related Requirements for Outer Continental Shelf Facilities

Triennial Exercise Cycle: Compliance Worksheet

OSPD Tracking Number:

Check box to record OSPR exercise compliance

OSPD Docket Number:

From _____ To _____

Exercise Compliance Worksheet Applicability:

§254.42(a): Oil Spill Response Plan (OSRP) Review Exercise Evaluation

Complete Blocks 1-6

§254.42(b): Exercise-Specific Event

Complete Blocks 1-5

Instructions: Form can be utilized for OSRP review, using one form per plan per 3-year cycle or one form per exercise evaluated.

Triennial Exercise Cycle Tracking

CY: _____ CY: _____

Quarters _____ Quarters _____

1 2 3 4 5 6 7 8 9 10 11 12

Legal Citation

§254.42(b)(1)* SRMT Tabletop Exercise

§254.42(b)(2)* Onshore Equipment Deployment

§254.42(b)(3) Qualified Individual (QI) Notification

§254.42(b)(4)* Oil Spill Removal Organization (OSRO) Equipment Deployment

§254.42(g) Government-Initiated Unannounced Exercises

Exercise Modifiers: Place an additional "X" where appropriate in order to qualify compliance for any exercise(s) documented.

Scenario Type:
 Large continuous spill?
 Short spill duration?
 Limited volume?
 Worst case discharge?
 Owner/Operator
 OSRO

Reviewed by:

Circle one:
 Frequency or location
 Equipment: Deployed or operated
 Deployment: Procedures or strategies

Instructions: Place an "X" in this row if one exists in the column above it. Triennial cycle exercise compliance achieved only when entire bottom row has an "X."

BLOCK 4	Core Plan Components					
	Operational Response	Response Support	Org. Design	Operational Response	Response Support	Documentation
	Disposal	Procurement	Operate RMS	Disposal	Procurement	Documentation
	Protection	Personnel Support	Staff Mobilization	Protection	Personnel Support	
	Recovery	Transportation	Notification	Recovery	Transportation	
	Assessment	Communications		Assessment	Communications	
	Containment			Containment		
	Discharge Contained			Discharge Contained		

Per 30 CFR §254.42(a): OSRP exercised within triennial cycle:

Yes No

Reviewer Signature:

Enforcement Action: Yes No

ENF OSPD Tracking #:

Exercise Compliance Evaluation Form		OSPD Tracking Number:			Date:			
Block 1: Exercise Type		Block 2: Notification			Block 3: Exercise Name and Location			
<input type="checkbox"/>	§254.42(b)(1)	SRMT TTX	<input type="checkbox"/> Yes <input type="checkbox"/> No	Date:	Evaluation Form # _____ of _____			
<input type="checkbox"/>	§254.42(b)(2)	Onshore Equipment Deployment	<input type="checkbox"/> Yes <input type="checkbox"/> No	Date:				
<input type="checkbox"/>	§254.42(b)(3)	QI Notification						
<input type="checkbox"/>	§254.42(b)(4)	Offshore Equipment Deployment	<input type="checkbox"/> Yes <input type="checkbox"/> No	Date:	Block 4: Initiating Authority			
<input type="checkbox"/>	§254.42(g)	Government-Initiated Unannounced Exercise (If checked, skip Block 4)			<input type="checkbox"/> Owner	<input type="checkbox"/> Operator	<input type="checkbox"/> OSRO	<input type="checkbox"/> Owner/Operator
Block 5: Objectives Evaluation								
Instructions: Based on the type of exercise being witnessed and evaluated, check each objective that is met and add brief comments as necessary.								
5A: SRMT Tabletop Exercise Compliance Evaluation								
List of Associated Objectives		Evaluator Comments				Objective met?		
5A-1: Exercise the spill management team's organization, communication, and decision making in managing a spill response to an unannounced scenario.						<input type="checkbox"/> Yes <input type="checkbox"/> No		
5A-2: Exercise the spill management team in a review of the following: (a) Knowledge of Response Plan						<input type="checkbox"/> Yes <input type="checkbox"/> No		
(b) Proper notifications						<input type="checkbox"/> Yes <input type="checkbox"/> No		
(c) Communications system						<input type="checkbox"/> Yes <input type="checkbox"/> No		
(d) Ability to access OSRO						<input type="checkbox"/> Yes <input type="checkbox"/> No		
(e) Coordination of OSRO containment and recovery activity						<input type="checkbox"/> Yes <input type="checkbox"/> No		
(f) Coordination of organization or agency personnel with responsibility for spill response						<input type="checkbox"/> Yes <input type="checkbox"/> No		
(g) Ability to effectively coordinate spill response activity with National Response System infrastructure						<input type="checkbox"/> Yes <input type="checkbox"/> No		
(h) Ability to access information in the Area Contingency Plan						<input type="checkbox"/> Yes <input type="checkbox"/> No		
5B: Equipment Deployment Exercise Compliance Evaluation								
5B-1: Demonstrate ability of spill response personnel to deploy and operate equipment.						<input type="checkbox"/> Yes <input type="checkbox"/> No		
5B-2: Evaluate deployment strategies under various spill scenarios.						<input type="checkbox"/> Yes <input type="checkbox"/> No		
5C: Government-Initiated Unannounced Exercises								
5C-1: Conduct proper notifications to respond to unannounced scenario.						<input type="checkbox"/> Yes <input type="checkbox"/> No		
5C-2: Demonstrate ability to mobilize adequate equipment to respond to scenario.						<input type="checkbox"/> Yes <input type="checkbox"/> No		
5C-3: Demonstrate ability to conduct timely deployment of equipment.						<input type="checkbox"/> Yes <input type="checkbox"/> No		
5C-4: Demonstrate ability to conduct proper deployment to respond to scenario.						<input type="checkbox"/> Yes <input type="checkbox"/> No		
Block 6	May the plan holder claim exercise credit? <input type="checkbox"/> Yes <input type="checkbox"/> No	Additional Comments:						
Exercise Evaluator/Team Lead:					Time/Date:			
Print Name					Signature			

Response Personnel Training Audit		OSPD Tracking Number:	Date:
Block 1: Audit Mode	Block 2: Auditee and Audit Location		Block 3: Records Retention
<input type="checkbox"/> Attend Training	Organization/Plan holder being audited:		Are all training certificates and training attendance records kept at the location designated in the OSRP for the last 2 years?
<input type="checkbox"/> Exercise-Related Training			<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Independent	Provide facility's physical address or GPS coordinates:		Are all the records being made available to the authorized BSEE representative upon request?
<input type="checkbox"/> Preparedness Verification			<input type="checkbox"/> Yes <input type="checkbox"/> No
Block 4: Response Personnel Training Compliance Verification			
Annual Training Requirements per 30 CFR §254.41(a), (b), and (c)		Training Records Verification per 30 CFR §254.41(d)	
Instructions: Only one organization, OSRO, or planholder's response personnel can be audited per form. Check the box next to the appropriate training group being audited.		Instructions: For each training group being audited, list the forms provided as evidence that the required training took place within a calendar year. Check Yes if the training records provided for that group indicate that the plan holder met the minimum training requirements. Check No if they do not adequately indicate that the planholder's training requirements were met. Note any discrepancies in Block 5.	
(a) <input type="checkbox"/> Spill Response Operating Team (SROT)		Training records adequate? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Operators attend hands-on training classes to include the deployment and operation of the response equipment they will use.			
Operator supervisors must be trained in directing the deployment and use of the response equipment.			
(b) <input type="checkbox"/> Spill Response Management Team (SRMT)		Training records adequate? <input type="checkbox"/> Yes <input type="checkbox"/> No	
(1) Locations, intended use, deployment strategies, and the operational and logistical requirements of response equipment?			
(2) Spill reporting procedures?			
(3) Oil spill trajectory analysis and predicting spill movement?			
(4) Any other responsibilities the SRMT may have?			
(b) <input type="checkbox"/> Spill Response Coordinator and Alternates		Training records adequate? <input type="checkbox"/> Yes <input type="checkbox"/> No	
(1) Locations, intended use, deployment strategies, and the operational and logistical requirements of response equipment?			
(2) Spill reporting procedures?			
(3) Oil spill trajectory analysis and predicting spill movement?			
(4) Any other responsibilities the SRMT may have?			
(c) <input type="checkbox"/> Qualified Individual*		Training records adequate? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Must be sufficiently trained to perform Qualified Individual duties. (*No annual requirement)			
Block 5: Verification Conditions	Instructions: Provide details for any inadequate training records and include any enforcement action reference numbers.		
Response Personnel Training Auditor: Print Name		Signature	Time/Date:

TEC Control Sheet

Docket #:	OSRP Name:
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OSROs					
SMT	Response	Shoreline	Well Containment	Wildlife	Other

Notification Date						
Exercise Date						

TEC Compliance Block	OSPD Tracking #:	Date:												
<input type="checkbox"/> 41(a) <input type="checkbox"/> 41(b) <input type="checkbox"/> 41(c) <input type="checkbox"/> 42(b)(1) <input type="checkbox"/> 42(b)(2) <input type="checkbox"/> 42(b)(3) <input type="checkbox"/> 42(b)(4) <input type="checkbox"/> 42(d) <input type="checkbox"/> 42(g)	<table border="1" style="width:100%"> <tr> <td style="width:25%">Initiated by:</td> <td style="width:12.5%">Training Audited</td> <td style="width:12.5%">Audited</td> <td style="width:12.5%">Observed</td> <td style="width:12.5%">Participated</td> <td style="width:12.5%">In Compliance</td> </tr> <tr> <td> </td> <td> <input type="checkbox"/> Yes <input type="checkbox"/> No By: </td> <td> <input type="checkbox"/> Yes <input type="checkbox"/> No By: </td> <td> <input type="checkbox"/> Yes <input type="checkbox"/> No By: </td> <td> <input type="checkbox"/> Yes <input type="checkbox"/> No By: </td> <td> <input type="checkbox"/> Yes <input type="checkbox"/> No </td> </tr> </table>	Initiated by:	Training Audited	Audited	Observed	Participated	In Compliance		<input type="checkbox"/> Yes <input type="checkbox"/> No By:	<input type="checkbox"/> Yes <input type="checkbox"/> No				
Initiated by:	Training Audited	Audited	Observed	Participated	In Compliance									
	<input type="checkbox"/> Yes <input type="checkbox"/> No By:	<input type="checkbox"/> Yes <input type="checkbox"/> No By:	<input type="checkbox"/> Yes <input type="checkbox"/> No By:	<input type="checkbox"/> Yes <input type="checkbox"/> No By:	<input type="checkbox"/> Yes <input type="checkbox"/> No									

Enforcement Activity Code:	Comments:

After Action:	Date Completed

EVC Capability: Appendix Reference

Appendix X Preparedness Verification Worksheet.....	X80
Appendix Y Preparedness Verification Job Aid*	Y84
Appendix Z Tier II Supplemental Checklists.....	Z88
Oil Spill Boom (Except Offshore and Fire)	Z88
Spill Response Vessels Only	Z90
Wildlife Management	Z92
Skimming System.....	Z94
Offshore Boom System	Z98
Fire Boom System.....	Z100
Dispersant Application System	Z102
Temporary Storage Device.....	Z104
Equipment Not Otherwise Categorized	Z106
Additional Comments.....	Z108
Appendix AA Photo Log.....	AA110
Appendix BB EVC Control Sheet.....	BB111

Oil Spill Response Equipment: Preparedness Verification Worksheet

OSPD Tracking No. _____

Prepared by: _____

Oil Spill Preparedness Division Office:

Part I: Equipment Depot	Facility Name:			GPS Coordinates (decimal-degree format):			
	Street Address:						
	City, State:				Zip:		
	Facility Description (estimate number of onsite staff and any other pertinent characteristics):						
	Check all that apply:		<input type="checkbox"/> OSRO Facility	<input type="checkbox"/> Onshore Facility	<input type="checkbox"/> Offshore Facility	<input type="checkbox"/> Other:	
	<input type="checkbox"/> Inventory Only	<input type="checkbox"/> Inventory and Verification	<input type="checkbox"/> Joint Preparedness Verification				
Part II: Coordination and Notification	1. The preparedness verification meeting date and time: _____						
	2. Verification activity coordination and notification (document the date each agency was contacted):						
	a. BSEE Regional Supervisor or District Office: _____						
	b. Nearest USCG Sector Incident Management Division Chief: _____						
	c. USCG National Strike Force Coordination Center: _____						
d. Applicable State agency with similar regulatory authority: _____							
3. The preparedness verification pre-brief date and time: _____							
4. A copy of this document and any completed supplemental material may be left with the plan holder for informational purposes and/or corrective action guidance.							
Part III: OGAs	If preparedness verification meeting is conducted jointly, list other government agencies and their objectives:						
Part IV: Safety Analysis	Block 1		Document the personal protective equipment (PPE) required for on-site activities and review the applicable job safety hazard analysis:				
	<input type="checkbox"/> Hard hat		<input type="checkbox"/> Safety gloves		<input type="checkbox"/> Hearing protection		
	<input type="checkbox"/> Steel-toed shoes		<input type="checkbox"/> Safety glasses		<input type="checkbox"/> BSEE Uniform		
	<input type="checkbox"/> Reflective vest		<input type="checkbox"/> PFD		<input type="checkbox"/> Flight helmet		
	<input type="checkbox"/> Steel-toed snow boots		<input type="checkbox"/> Parkas		<input type="checkbox"/> Thermal gloves		
	<input type="checkbox"/> Snow pants		<input type="checkbox"/> Aircrew anti-exposure flight suit				
	Block 2		Are there additional hazards not identified or addressed specific to this activity? Yes / No			Site-specific job safety hazard analysis addendum:	
	If no, stop here and continue onto Part V.						
	If yes, is the activity too risky to continue? Yes / No						
	If yes, contact appropriate OSPD supervisor for further guidance.						
If no, document additional hazards and then continue onto Part V of this form.							

Tier I: Records Review

Part V: Records Review

Oil spill response equipment preparedness verification is conducted using a tiered approach; starting with a Tier I records review (off-site and on-site) and an on-site equipment inventory. Select the authority that applies:

- 30 CFR §254.30: When must I revise my response plan?** (d) *The Regional Supervisor will periodically review the equipment inventories of OSROs to ensure that sufficient spill removal equipment is available to meet the cumulative needs of the O/Os who cite these organizations in their plans.*
- 30 CFR §254.40 Records.** *You must make all records of services, personnel, and equipment provided by OSROs or cooperatives must be made available to any authorized Bureau of Safety and Environmental Enforcement (BSEE) representative upon request.*
- 30 CFR §254.43 Maintenance and periodic inspection of response equipment.** (a) *You must ensure that the response equipment listed in their response plan is inspected at least monthly and is maintained, as necessary, to ensure optimal performance.* (b) *You must ensure that records of the inspections and the maintenance activities are kept for at least 2 years and are made available to any authorized BSEE representative upon request.* (NOTE: You means the owner or the operator)

Attach a copy of the records request letter to this form. Document any recordkeeping issues and detail the corrective action recommendations below, include dates if the review is/was completed offsite. Add any comments regarding the on-site equipment inventory.

Document your decision and justification to either end the verification activity or continue with a Tier II performance test.

Part VI: Tier II Performance Test	<p>30 CFR §254.45 Verifying the capabilities of your response equipment. (a) The Regional Supervisor may require performance testing of any spill response equipment listed in the OSRP to verify its capabilities if the equipment: 1) Has been modified 2) Has been damaged and repaired or 3) Has claimed effective daily recover capacity (EDRC) that is inconsistent with data otherwise available to BSEE (c) You are responsible for any required testing of equipment performance and for the accuracy of the information submitted.</p>		
	<p>Performance testing is limited to ensuring that the equipment is stored appropriately, can be mobilized for transport within a reasonable amount of time, can be turned on and sufficiently operated by personnel, and operates within manufacturer specifications. Identify the regulatory authority, document the serial number and add a brief summary of the performance test outcome.</p>		
1. Make/Model and Serial No.:	<input type="checkbox"/> Modification	<input type="checkbox"/> Damaged and repaired	<input type="checkbox"/> Inconsistent EDRC
Comments:			
2. Make/Model and Serial No.:	<input type="checkbox"/> Modification	<input type="checkbox"/> Damaged and repaired	<input type="checkbox"/> Inconsistent EDRC
Comments:			
3. Make/Model and Serial No.:	<input type="checkbox"/> Modification	<input type="checkbox"/> Damaged and repaired	<input type="checkbox"/> Inconsistent EDRC
Comments:			
4. Make/Model and Serial No.:	<input type="checkbox"/> Modification	<input type="checkbox"/> Damaged and repaired	<input type="checkbox"/> Inconsistent EDRC
Comments:			
5. Make/Model and Serial No.:	<input type="checkbox"/> Modification	<input type="checkbox"/> Damaged and repaired	<input type="checkbox"/> Inconsistent EDRC
Comments:			
6. Make/Model and Serial No.:	<input type="checkbox"/> Modification	<input type="checkbox"/> Damaged and repaired	<input type="checkbox"/> Inconsistent EDRC
Comments:			
7. Make/Model and Serial No.:	<input type="checkbox"/> Modification	<input type="checkbox"/> Damaged and repaired	<input type="checkbox"/> Inconsistent EDRC
Comments:			
8. Make/Model and Serial No.:	<input type="checkbox"/> Modification	<input type="checkbox"/> Damaged and repaired	<input type="checkbox"/> Inconsistent EDRC
Comments:			
9. Make/Model and Serial No.:	<input type="checkbox"/> Modification	<input type="checkbox"/> Damaged and repaired	<input type="checkbox"/> Inconsistent EDRC
Comments:			
10. Make/Model and Serial No.:	<input type="checkbox"/> Modification	<input type="checkbox"/> Damaged and repaired	<input type="checkbox"/> Inconsistent EDRC
Comments:			

Part VII: Equipment Verification Supplemental Checklist	Using the equipment identified for Tier II performance testing in Part VI above, indicate how many supplemental checklists will be required per equipment category below. Ensure that all of the completed supplemental checklists are attached to this form.			
	<u>Equipment Category</u>		<u>Supplement Checklist</u> (QTY)	
	Oil Spill Boom (Except Offshore and Fire)		A	_____
	Spill Response Vessels Only		B	_____
	Wildlife Management		C	_____
	Skimming System		D	_____
	Offshore Boom System		E	_____
	Fire Boom System		F	_____
	Dispersant Application System		G	_____
	Temporary Storage Device		H	_____
	Equipment Not Otherwise Categorized		I	_____
	Additional Comments		J	_____
(Reserved for future editions)		K	_____	
(Reserved for future editions)		L	_____	
Part VIII: Tier III Deployment Exercise	Justification for a Tier III equipment deployment requires that the Tier II performance test could not adequately ensure preparedness. The O/O may take credit for the deployment as part of their overall exercise requirements. The authority to require a Tier III deployment exercise is as follows: 30 CFR §254.42 Exercises for your response personnel and equipment. (h) <i>The Regional Supervisor may require changes in the frequency or location of the required exercises, equipment to be deployed and operated, or deployment procedures or strategies. The Regional Supervisor may evaluate the results of the exercises and advise the O/O of any needed changes in response equipment, procedures, or strategies.</i>			
	Specify equipment from Part VI, provide Tier III justification, identify plan holder designee and exercise compliance evaluation OSPD tracking number:			
Part IX: Data Summary	Percentage of equipment verified within OSRP:		Tier III conducted? Yes / No	OSPD Tracking Number:
	Percentage of equipment verified within depot:		Number of corrective action recommendations:	
	Number of equipment performance tested onsite:		Enforcement case? Yes / No	OSPD Tracking Number:
	Tier II Equipment performance results	Passed:	Failed:	Unavailable:
Part X: Signature Block	OSPD Team Lead: _____ Date: _____		Signature: _____ Date: _____	
	OSPD Team Member: _____ Date: _____		Signature: _____ Date: _____	
	OSPD Team Member: _____ Date: _____		Signature: _____ Date: _____	

Oil Spill Equipment Preparedness Verification Job Aid*

Part 1: Pre-brief and Equipment Depot/Facility Entry

Part 2: Verification Areas

Tier I: Records Review

Tier II: Equipment Performance Testing

Tier III: Deployment Exercise

Item	Verification Part 1: Pre-brief and Equipment Depot/Facility Entry
<input type="checkbox"/> 1-01	Coordinate with the plan holder a minimum of 5 days in advance to schedule on-site preparedness verification meeting. Ensure that they are prepared to initiate every tier activity within the preparedness verification process.
<input type="checkbox"/> 1-02	Send a verification activity notification email to the following offices/agencies at least 15 business days prior to the scheduled preparedness verification meeting: Appropriate OSPD supervisor, Nearest USCG Sector Incident Management Division (IMD) Chief, National Strike Force Coordination Center's (NSFCC's) Preparedness Coordinator at the NSFCC, and Applicable State agency with similar regulatory authority.
<input type="checkbox"/> 1-03	The preparedness verification worksheet should be completed to account for all off-site records reviews prior to the verification team pre-brief. However, additional records may be reviewed at anytime during this activity.
<input type="checkbox"/> 1-04	Equipment preparedness verification meetings are prearranged and the team should utilize an ICS 214 to document the preparedness verification meeting activities.
<input type="checkbox"/> 1-05	All preparedness verification meetings shall be conducted with a minimum of two OSPD personnel, with one designated as team lead. The appropriate OSPD supervisor must approve any deviance from this minimum staffing.
<input type="checkbox"/> 1-06	The team lead shall address all of the meeting attendees with a review of the entire preparedness verification process, including regulatory authority and the Tier I, II, and III goals.
<input type="checkbox"/> 1-07	Ensure a job hazard analysis is completed to include any OGA regulators. If another agency has prepared an independent job hazard analysis, obtain a copy for the administrative record.
<input type="checkbox"/> 1-08	Establish contact with onsite equipment depot representatives and/or plan holder representative. All OSPD must present credentials and establish your regulatory authority.
<input type="checkbox"/> 1-09	Ensure that required equipment depot personnel are onsite. <i>If there is any delay beyond what is reasonable, document that the requested personnel and/or equipment were unavailable to the team. Attempt to complete as much of the activity as possible.</i>
<input type="checkbox"/> 1-10	The OSPD team lead shall ensure that all members have clear job tasks, ensuring that the activity log, photo log, and appropriate checklists are being utilized and that all personnel are within line of sight of each other at all times.
<input type="checkbox"/> 1-11	All OSPD onsite activities and photos must be documented as part of the official record. Any and all notes taken shall remain as part of the official record.

* The Oil Spill Equipment (OSE) Preparedness Verification Job Aid is an internal OSPD document only. It is designed to assist OSPD personnel with the equipment preparedness verification activities as detailed within the OSPD Manual. The equipment verification capability (EVC) shall be followed when conducting these activities in the field. This form shall remain as part of the EVC activity administrative decision record, but shall not be released to the plan holder or OSRO representative.

Verification Part 2: Tier I On-Site Records Review

Item	
<input type="checkbox"/> 2-01	If an off-site records review was conducted in advance of the site visit, determine if additional on-site records review is necessary and/or appropriate. If an on-site records review is not necessary, the team may continue onto a Tier II performance test (checklist on next page). If on-site records review is necessary, go to checklist item 2-02.
<input type="checkbox"/> 2-02	Utilizing an onsite conference room or other room with adequate lighting and furniture, begin the on-site records review. The team may determine that additional records need to be reviewed for any reason, at any time.
<input type="checkbox"/> 2-03	Per 30 CFR §254.43(a), review current monthly maintenance and inventory records. The team may flag equipment for Tier II performance testing if any equipment has any of the following conditions documented: Mechanical or operational problems, operability modifications, effective daily recovery capacity discrepancies, or any associated documentation that calls into question the veracity of the record(s) that are being or have been examined.
<input type="checkbox"/> 2-04	Ensure that any records not available at the site of the inspection are submitted to OSPD for review.
<input type="checkbox"/> 2-05	Per 30 CFR §254.43(b) ensure that all types of records associated with flagged equipment are available for immediate review.
<input type="checkbox"/> 2-06	30 CFR §254.42(b)(2) Successful exercise deployments of flagged equipment may be substituted for the Tier II performance test at the discretion of the verification team lead. If the team chooses to accept the Tier II substitution, all appropriate records for the deployment exercise must be reviewed and verified.
<input type="checkbox"/> 2-07	If no preparedness activities are required beyond Tier I, the appropriate EVC documentation shall be completed and placed within the administrative record for the EVC activity.

Verification Part 2: Tier II Equipment Performance Testing

Item	
<input type="checkbox"/> 3-01	During the review of maintenance records, in conjunction with a review of the applicable OSRO equipment inventory, equipment flagged for a Tier II performance test should be documented on the preparedness verification worksheet. Utilizing the worksheet or other activity log, request via the facility point of contact (POC) that the flagged equipment be performance tested onsite as soon as possible.
<input type="checkbox"/> 3-02	Obtain and utilize the appropriate Tier II equipment verification supplemental checklists to provide the team with a template for verifying the preparedness status and operability during the performance test. Every checklist item must be marked to document a complete and thorough EVC activity.
<input type="checkbox"/> 3-03	Prior to the actual performance test and once the equipment is made available; the team shall record the current condition of each piece of equipment and document any discrepancies as compared to the inventory list.
<input type="checkbox"/> 3-04	The team lead shall ensure that all equipment performance test activities are photo documented and logged via the preparedness verification worksheet and ICS 214. The team must include, as part of the administrative record for the entire preparedness verification process, this job-aid and the corresponding equipment verification supplemental checklists.
<input type="checkbox"/> 3-05	All equipment must be fully functional on first start-up attempt. Fully functional is defined as equipment running and operable to manufacturer specifications after the first start-up attempt. <i>Any equipment not fully functional on first start-up attempt should be repaired if possible on-site, and pass a second performance test while the team is on-site. If the equipment does not pass the second performance test it may be flagged for a Tier III deployment exercise.</i>
<input type="checkbox"/> 3-06	The plan holder must demonstrate that the inoperable equipment has an equivalent replacement or that the unavailability does not constitute a significant reduction on their response capability. Any questions regarding a reduction in capability should be discussed with the appropriate OSPD supervisor.
<input type="checkbox"/> 3-07	Each Tier II performance test conducted per piece of equipment shall have one supplemental checklist and be properly documented within the preparedness verification worksheet. <i>Any equipment that is fully functional on the first start-up attempt but that cannot be properly operated by the available personnel should be flagged for a Tier III deployment exercise and the O/O of the applicable OSRP should be referred for enforcement.</i>
<input type="checkbox"/> 3-08	If performance testing equipment aboard a USCG inspected vessel, ensure that the performance test is limited to oil spill response equipment. Preparedness verification of the power, navigation systems, and sea worthiness of OSRO vessels are not allowed as the USCG regulates them. However, any anomalies with those specific systems shall be referred to the local USCG Sector Prevention Department, Chief of Inspections.
<input type="checkbox"/> 3-09	Once all preparedness verification activities are complete, the team lead shall complete the Oil Spill Response Equipment Preparedness Verification Worksheet. A copy of the completed form shall be provided to the plan holder POC or facility representative once the entire EVC activity has been completed.
<input type="checkbox"/> 3-10	With all preparedness verification meeting attendees present, provide an oral summary of the results to the plan holder POC or facility representative. The team lead shall endeavor to answer any relevant questions or note the questions for more formal answers at a later date.
<input type="checkbox"/> 3-11	If Tier III actions are not necessary, the verification meeting ends with an exit interview with all EVC activity participants. Copies of the worksheet and other applicable forms shall be emailed to the plan holder once the administrative record is complete. If a Tier III deployment exercise is warranted, continue to #4-01.

Verification Part 2: Tier III Deployment Exercise

Item	
<input type="checkbox"/> 4-01	Planned exercise deployments of flagged equipment may be substituted for the Tier III exercise deployment at the discretion of the verification team lead. If the team chooses to accept the Tier III substitution, that triggers an automatic exercise compliance verification requirement for OSPD personnel. The team lead shall coordinate with the appropriate OSPD staff to ensure the exercise verification is conducted per OSPD Manual, TEC-1 SOP.
<input type="checkbox"/> 4-02	<p>If there is no planned exercise deployment for the Tier III flagged equipment in the near future (as determined by the team lead) then the plan holder POC or facility representative has 48 hours from the initiation of the preparedness verification meeting to complete the Tier III deployment exercise for each piece of flagged equipment.</p> <p>NOTE 1: Tier III deployment exercises, requested under the preparedness verification process, utilizing the authority found in 30 CFR §254.42(h), do not need to comply with 30 CFR §254.42(f) 30-day notification requirements.</p> <p>NOTE 2: The plan holder may use the Tier III deployment exercise for appropriate exercise credit under the exercise requirements set forth by 30 CFR §254.42.</p>
<input type="checkbox"/> 4-03	<p>Prior to the beginning of the exercise deployment, the team lead should ensure that the equipment operators are trained to appropriately participate in the exercise deployment, under the OSPD Manual's TEC-1 SOP. Once a Tier III deployment exercise is requested, this will necessitate an exercise verification docket to be created onsite.</p> <p>NOTE 3: Ideally, every preparedness verification team is prepared to conduct a Tier III deployment exercise and the corresponding deployment exercise evaluation as per the OSPD Manual.</p>
<input type="checkbox"/> 4-04	The team shall ensure that a Tier III deployment exercise by the plan holder is conducted and that it is evaluated by OSPD within 48 hours of the initiation of the preparedness verification meeting. Results from the deployment exercise shall be documented for each docket and administrative record.
<input type="checkbox"/> 4-05	The equipment preparedness verification process cannot be completed until all tier activities have been completed for all applicable dockets. Once all preparedness verification activities are completed, the team lead should refer back to items #3-08 and #3-09 with regard to completing the Oil Spill Response Equipment Preparedness Worksheet and applicable tier II supplemental forms.

Supplemental Checklist A: Oil Spill Boom (Except Offshore and Fire)		OSPD Tracking Number:	
Equipment Location (facility/depot):		Completed by:	
Equipment Name and Type:	Initial Result: <input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail		
Equipment ID Number:	Comments:		
Oil Spill Equipment Preparedness Verification Evaluation		Corrective Action Determination and Comments	
A1. Is the boom stored properly and protected from the elements in a way that minimizes, to the greatest extent practicable, damage to the equipment?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable (N/A)	<input type="checkbox"/> Not Evaluated (N/E)	<input type="checkbox"/> Not Evaluated (N/E)
Comments:		Comments:	
A2. Is the boom anchoring systems (to include floats, stakes, or anything else needed to conduct booming strategies on water or near shore) stored with or near this boom? If so, how? If not, indicate any limitations to rapid deployment.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A	<input type="checkbox"/> N/E
Comments:		Comments:	
A3. Are all connectors, cables, and tension members functioning properly?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A	<input type="checkbox"/> N/E
Comments:		Comments:	
A4. <u>Check boom skin:</u> Is there any physical damage or excessive wear of any type resulting from use or storage, including holes, gouges, tears, rips, crimps, or abrasions?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A	<input type="checkbox"/> N/E
Comments:		Comments:	
A5. <u>Check boom skin:</u> Is there any sign of defect or deterioration in material or construction, including brittleness, irregular seal techniques, unfinished components, or poor product finishing?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A	<input type="checkbox"/> N/E
Comments:		Comments:	
A6. <u>Check all metal and plastic mechanical parts:</u> Is there any physical damage or excessive wear of any type resulting from use or storage such as cracks, breaks, abrasions, or deformation?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A	<input type="checkbox"/> N/E
Comments:		Comments:	
A7. <u>Check all metal and plastic mechanical parts:</u> Do all the appropriate parts of the boom and boom assembly have the ability to move, flex, and connect as designed? (Boom should be flexible and move freely.)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A	<input type="checkbox"/> N/E
Comments:		Comments:	
A8. <u>Check all metal and plastic mechanical parts:</u> Are there signs of defect or deterioration in material or construction? Is there corrosion? Are there poorly manufactured components or is there an overall failure of individual boom parts?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A	<input type="checkbox"/> N/E
Comments:		Comments:	
A9. <u>Check all metal and plastic mechanical parts:</u> Select sections of boom to deploy in water. Once deployed, do all the boom section bladders stay afloat?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	<input type="checkbox"/> N/A	<input type="checkbox"/> N/E
Comments:		Comments:	

<p>A10. <u>Check all metal and plastic mechanical parts</u>: Is there a potential safety hazard to response personnel during boom deployment or during any other aspect of boom operation?</p> <p>A11. Are there any obvious problems with the boom that might prevent a towing vessel from being able to perform on-water oil containment and recovery operations in conjunction with a skimming system?</p> <p>A12. Does any part of the boom show signs of wear, damage, faulty design, or deterioration that could result in spillage of the contained oil or create safety hazards for the on-water operator deploying the boom?</p> <p>A13. <u>Lifting points</u>: Is there rust or are there deformations in the metal, damage, cracks in welds, or other imperfections that might result in failure when moving the boom by crane or other means from storage location, trailers, or boats?</p> <p>A14. <u>Boom anchoring systems</u>: Are floats, anchors, and other parts of the anchoring systems free of major abrasions, cracks, surface ruptures, or other imperfections that could result in premature failure when deployed on water?</p> <p>A15. <u>Boom section connectors</u>: Are the boom section connectors in good condition and do quick-lock connectors move freely and stay secure when deployed on water?</p> <p>A16. When multiple boom sections are deployed on water and secured with appropriate anchoring systems, is there any evidence of failure from any portion of the boom, connectors, anchors, and/or floats?</p> <p>A17. Is soft boom stored with or near this boom? If so, check its condition, appropriateness of storage, and usability if deployed.</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p> <p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p> <p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p> <p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p> <p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p> <p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p>																		
<p>Document results from Tier II Performance testing below and for any follow-up conducted at a later date. Only one OSPD tracking number shall be used per Tier II test. Utilize the results section</p>																			
<table border="1"> <thead> <tr> <th colspan="2">Verification Results</th> <th colspan="2">Verification Results</th> <th colspan="2">Verification Results</th> </tr> </thead> <tbody> <tr> <td>Date:</td> <td>Date:</td> <td>Date:</td> <td>Date:</td> <td>Date:</td> <td>Date:</td> </tr> <tr> <td><input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail</td> <td>Comment:</td> <td><input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail</td> <td>Comment:</td> <td><input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail</td> <td>Comment:</td> </tr> </tbody> </table>		Verification Results		Verification Results		Verification Results		Date:	Date:	Date:	Date:	Date:	Date:	<input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail	Comment:	<input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail	Comment:	<input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail	Comment:
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Date:	Date:	Date:	Date:	Date:	Date:														
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Supplemental Checklist B: Spill Response Vessels Only		
Equipment Location (facility/depot):	OSPD Tracking Number:	
Equipment Name and Type:	Completed by:	
Equipment ID Number:	Initial Result: <input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail	
Comments:		
Oil Spill Equipment Preparedness Verification Evaluation		
Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable (N/A) <input type="checkbox"/> Not Evaluated (N/E)		
Comments:		
B1. What is the length of the Vessel? Is the vessel capable of operating in the environment intended by the manufacturer?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E	
Comments:		
B2. Does the vessel of a USCG Issued Certificate of Inspection? If so, is there a valid Certificate of Inspection?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E	
Comments:		
B3. Is the vessel able to get underway using its own propulsion systems? Are there any obvious limitations on the ability for the vessel to get underway properly?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E	
Comments:		
B4. Are there any other problems that might prevent the vessel from being able to perform oil recovery operations?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E	
Comments:		
Document results from Tier II Performance testing below. Only one OSPD tracking number shall be used per Tier II test. Utilize the results section below for any follow-up conducted at a later date.		
Verification Results	Verification Results	Verification Results
Date:	Date:	Date:
<input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail
Comment:	Comment:	Comment:

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Supplemental Checklist C: Wildlife Management	
Equipment Location (facility/depot):	OSP Tracking Number:
Equipment Name and Type:	Completed by:
Equipment ID Number:	Initial Result: <input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail
Comments:	
Corrective Action Determination and Comments	
C1. Is the wildlife management equipment transport container in satisfactory condition?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable (N/A) <input type="checkbox"/> Not Evaluated (N/E)
Comments:	
C2. Are the wildlife rehabilitation trailer and/or other wildlife management-related trailers operational?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E
Comments:	
C3. Does the propulsion system operate properly?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E
Comments:	
C4. Are the wildlife management equipment and/or trailers stored properly and protected from the elements in a way that minimizes, to the greatest extent practicable, damage to the equipment?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E
Comments:	
C5. When connected to propane tanks and set for operation, do the hazing guns produce their loud warning sound at set intervals? Are all of the propane tanks used to operate the hazing guns within the manufacturer's established lifespan?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E
Comments:	
C6. Does any part of the wildlife management equipment show signs of wear, damage, faulty design, or deterioration that could result in malfunctioning equipment or create safety hazards for the operator?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E
Comments:	
Document results from Tier II Performance testing below. Only one OSPD tracking number shall be used per Tier II test. Utilize the results section below for any follow-up conducted at a later date.	
Verification Results	Verification Results
Date:	Date:
<input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail
Comment:	Comment:

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Supplemental Checklist D: Skimming System		OSPD Tracking Number:
Equipment Location (facility/depot):		Completed by:
Equipment Name and Type:		Initial Result: <input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail
Equipment ID Number:		Comments:
Oil Spill Equipment Preparedness Verification Evaluation		Corrective Action Determination and Comments
D1. Check or write-in skim-head type:	<input type="checkbox"/> Weir <input type="checkbox"/> Brush <input type="checkbox"/> <input type="checkbox"/> Drum <input type="checkbox"/> Belt <input type="checkbox"/> <input type="checkbox"/> Disc <input type="checkbox"/>	Comments:
D2. Check all that apply or write-in included support systems:	<input type="checkbox"/> Crane <input type="checkbox"/> Trailer <input type="checkbox"/> Hydraulic System <input type="checkbox"/> <input type="checkbox"/> Storage Tank <input type="checkbox"/> Other:	Comments:
D3. Do the boom and outrigger deploy and operate properly?		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable (N/A) <input type="checkbox"/> Not Evaluated (N/E) Comments:
D4. Are all winches, cables, and blocks functioning properly?		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:
D5. Lifting points: Is there rust or are there deformations in the metal, damage, cracks in welds, or other imperfections that might result in failure when moving the load by crane or other means from storage location, trailers or boats? Has the crane been load test certified?		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:
D6. Does any part of the skimming system show signs of wear, damage, faulty design, or deterioration that could result in malfunctioning equipment or create safety hazards for the operator?		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:
D7. Is the lifting sling in satisfactory condition? If required, has the sling been load test certified?		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:
D8. If applicable, is the skimming system transport trailer in satisfactory condition?		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:
D9. If applicable, is the skimming system equipment stored properly and protected from the elements in a way that minimizes, to the greatest extent practicable, damage to the equipment?		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:

	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E	Comments:
D10. Is there any evidence of current or past leakage from any of the hoses or connections? Are there drip pans or sorbent pads for secondary leak containment available to operators?		
D11. Hoses and hose connections: Are hoses free of abrasions, cracks, surface bubbles, or other imperfections that could result in premature failure? Also, are there signs of multiple repairs of the hoses?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E	Comments:
D12. Hoses and hose connections: Are the hose connections in good condition and do quick-lock connectors move freely?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E	Comments:
D13. Hoses and hose connections: Is there any evidence of current or past leakage from any of the hose clamps or connections?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E	Comments:
D14. Flotation devices: Do the devices show evidence of damage from impacts, degradation from environmental conditions, excessive wear, brittleness, or other problems that would impact the buoyancy of the device?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E	Comments:
D15. Moving Parts: Request that the oil spill removal organization operates each selected prime mover and pump onsite and verified during operation whether the prime mover starts.	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E	Comments:
D16. Moving Parts: If applicable, is hydraulic or pneumatic pressure at level needed to operate equipment?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E	Comments:
D17. Moving Parts: Do impellers, screws, rollers, belts, doors, drive mechanisms, or other moving parts move and operate as designed?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E	Comments:
D18. Moving Parts: Do valves, handles, or other moving parts move and operate as designed?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E	Comments:
D19. Moving Parts: Do moving parts have guards to prevent harm to the operator?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E	Comments:
D20. Moving Parts: Do any of the parts show signs of wear or damage that could result in their failure to move freely and reduce skimming capacity?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E	Comments:

<p>D21. Construction Integrity: Does any part of the prime mover or pump show signs of wear, damage, or deterioration that could prevent that equipment from operating as designed?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p>
<p>D22. If applicable, do the communications systems function properly?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p>
<p>D23. If applicable, do the remote sensing instruments function properly?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p>
<p>D24. Safety: Do automated safety shutdown systems trip at preset levels?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p>
<p>D25. Safety: Do any parts of the prime mover or pump pose risks to the operator and, if so, have problems with those parts been properly resolved?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p>
<p>Document results from Tier II Performance testing below. Only one OSPD tracking number shall be used per Tier II test. Utilize the results section below for any follow-up conducted at a later date.</p>	
Verification Results	Verification Results
<p>Date:</p> <p><input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail</p> <p>Comment:</p>	<p>Date:</p> <p><input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail</p> <p>Comment:</p>

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Supplemental Checklist E: Offshore Boom System		OSPD Tracking Number:
Equipment Location (facility/depot):		Completed by:
Equipment Name and Type:		Initial Result: <input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail
Equipment ID Number:		Comments:
Oil Spill Equipment Preparedness Verification Evaluation		Corrective Action Determination and Comments
<input type="checkbox"/> Crane <input type="checkbox"/> Hydraulic System <input type="checkbox"/> Trailer <input type="checkbox"/> Other:		Comments:
E1. Check all that apply or write-in included support systems:		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable (N/A) <input type="checkbox"/> Not Evaluated (N/E)
E2. If applicable, is the offshore boom system transport trailer in satisfactory condition?		Comments:
E3. Is the boom stored properly and protected from the elements in a way that minimizes, to the greatest extent practicable, damage to the equipment?		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E
E4. Check boom skin: Is there any physical damage or excessive wear of any type resulting from use or storage, including holes, gouges, tears, rips, crimps, or abrasions?		Comments:
E5. Check boom skin: Are there any signs of defect or deterioration in material or construction, including brittleness, irregular seal techniques, unfinished components or poor product finishing?		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E
E6. Lifting points: Is there rust or are there deformations in the metal, damage, cracks in welds, or other imperfections that might result in failure when moving the load by crane or other means from storage location, trailers or boats? Has the crane been load test certified?		Comments:
E7. Is there any physical damage such as cracks, breaks, abrasions, or deformation, or excessive wear of any type resulting from use or storage?		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E
E8. Do all the appropriate parts of the boom and boom assembly have the ability to move, flex or connect as designed? Parts should move freely.		Comments:
E9. Are there signs of defect or deterioration in material or construction? Is there corrosion or are there poorly manufactured components or an overall failure of individual boom parts?		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E

<p>E10. Select sections of boom to inflate. Once inflated, do all the boom section bladders stay inflated?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>Comments:</p>	<p><input type="checkbox"/> N/E</p>
<p>E11. Is there a potential safety hazard to response personnel during boom deployment or any other aspect of boom operations?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>Comments:</p>	<p><input type="checkbox"/> N/E</p>
<p>E12. Does any part of the offshore boom system show signs of wear, damage, or deterioration that could prevent it from operating as designed?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>Comments:</p>	<p><input type="checkbox"/> N/E</p>
<p>Document results from Tier II Performance testing below. Only one OSPD tracking number shall be used per Tier II test. Utilize the results section below for any follow-up conducted at a later date.</p>		
Verification Results		Verification Results
Date:	Date:	Date:
<input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail	<input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail

Supplemental Checklist F: Fire Boom System		OSPD Tracking Number:
Equipment Location (facility/depot):		Completed by:
Equipment Name and Type:		Initial Result: <input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail
Equipment ID Number:		Comments:
Oil Spill Equipment Preparedness Verification Evaluation		Corrective Action Determination and Comments
F1. Check all that apply or write-in included support systems:	<input type="checkbox"/> Crane <input type="checkbox"/> Hydraulic System <input type="checkbox"/> Trailer <input type="checkbox"/> Other:	Comments:
F2. If applicable, is the fire boom system transport trailer in satisfactory condition?		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable (N/A) <input type="checkbox"/> Not Evaluated (N/E)
F3. Is the fire boom towing system (to include floats, bridals, cables, cooling/pump systems, and anything else needed to conduct <i>in situ</i> burn operations on water) stored with or near the fire boom? If so, how? If not, indicate any limitations to rapid deployment.		Comments:
F4. Is the fire boom system stored properly and protected from the elements in a way that minimizes, to the greatest extent practicable, damage to the equipment?		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E
F5. Are the contained oil igniters collocated with the fire boom and in good working condition?		Comments:
F6. Has the fire boom been reconditioned from prior use? If so, note the date of use and verify that it is operational in its current state and account for this conditional state when completing the remainder of the fire boom evaluation.		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E
F7. Check fire boom skin: Is there any physical damage or excessive wear of any type resulting from use or storage, including holes, gouges, tears, rips, crimps, or abrasions?		Comments:
F8. Is there rust or are there deformation in the metal damage, cracks in welds or other imperfections that might result in failure when moving the fire boom by crane or other means from storage location, trailers, or boats?		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E
F9. Check fire boom skin: Are there any signs of defect or deterioration in material or construction, including brittleness, irregular seal techniques, unfinished components or poor product finishing?		Comments:
		Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E

<p>F10. Do all the appropriate parts of the fire boom and boom assembly have the ability to move, flex or connect as designed? Parts should move freely.</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p>
<p>F11. Is there any evidence of current or past leakage from any of the hoses or connections? Are there drip pans or sorbent pads for secondary leak containment available to operators?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p>
<p>F12. Select sections of fire boom to deploy in water. Once deployed, does the fire boom stay afloat and does the cooling/pump system operate properly?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p>
<p>F13. Are floats, towing systems, and other parts of the fire boom cooling/pump systems free of major cracks, hose ruptures, or other mechanical issues that could result in premature failure when deployed for <i>in situ</i> burn operations?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p>
<p>F14. Is there a potential safety hazard to response personnel during fire boom deployment or any other aspect of boom operations? Do any parts of the fire boom system pose risks to the operator and, if so, have problems with them been properly resolved?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p>
<p>F15. Are there any problems with the fire boom that might prevent a towing vessel from being able to perform on-water oil containment and <i>in situ</i> burn operations?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p>
<p>F16. Does any part of the fire boom show signs of wear, damage, faulty design, or deterioration that could result in spillage of the contained oil or create safety hazards for the on-water operator deploying the fire boom or collecting burnable oil for <i>in situ</i> burn operations?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p>
<p>F17. Do automated safety and shutdown system trip at preset levels?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E</p> <p>Comments:</p>
<p>Document results from Tier II Performance testing below. Only one OSPD tracking number shall be used per Tier II test. Utilize the results section below for any follow-up conducted at a later date.</p>	
Verification Results	
<p>Date:</p>	<p>Date:</p>
<p><input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail</p>	<p>Comment:</p>
<p><input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail</p>	<p>Comment:</p>
Verification Results	
<p>Date:</p>	<p>Date:</p>
<p><input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail</p>	<p>Comment:</p>
<p><input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail</p>	<p>Comment:</p>

Supplemental Checklist G: Dispersant Application System							
Equipment Location (facility/depot):	OSPD Tracking Number:						
Equipment Name and Type:	Completed by:						
Equipment ID Number:	Initial Result: <input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail						
Comments:							
Oil Spill Equipment Preparedness Verification Evaluation							
G1. Check the platform that the dispersant application system is or is intended to be installed within: <table border="1" style="margin-left: 20px; width: 60%;"> <tr> <td><input type="checkbox"/> Aircraft</td> <td><input type="checkbox"/> Subsea</td> </tr> <tr> <td><input type="checkbox"/> Portable</td> <td></td> </tr> <tr> <td><input type="checkbox"/> Vessel</td> <td></td> </tr> </table>	<input type="checkbox"/> Aircraft	<input type="checkbox"/> Subsea	<input type="checkbox"/> Portable		<input type="checkbox"/> Vessel		Comments: Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable (N/A) <input type="checkbox"/> Not Evaluated (N/E)
<input type="checkbox"/> Aircraft	<input type="checkbox"/> Subsea						
<input type="checkbox"/> Portable							
<input type="checkbox"/> Vessel							
G2. Is dispersant collocated with the dispersant system platform? If yes, document the type and quantity of dispersant. If no, document the logistics necessary to obtain dispersant for on-water operations.	Comments: Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E						
G3. Does the propulsion system operate properly?	Comments: Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E						
G4. If applicable, is the dispersant stored properly and protected from the elements in a way that minimizes, to the greatest extent practicable, chemical deterioration?	Comments: Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E						
G5. Does all of the dispersant application apparatus work properly?	Comments: Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E						
G6. Are all hoses free of abrasions, cracks, surface bubbles, or other imperfections that could result in premature failure? Also, are there signs of multiple repairs of the hoses?	Comments: Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E						
G7. Are the hose connections in good condition? Is there any evidence of current or past leakage from any of the hoses or connections?	Comments: Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E						
G8. Preparedness team should request that the equipment be operated as circumstances allow.	Comments: Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E						

<p>The team should witness the ability of the unit to move water, and verify during operation whether impellers, screws, rollers belts, doors, drive mechanisms or other moving parts move and operate as designed.</p>	<p>Comments:</p>				
<p>G9. Do any of the parts show signs of wear or damage that could result in their failure to move freely and/or reduce dispersant application volume?</p>	<p>Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p>		<p><input type="checkbox"/> N/E</p>		
<p>G10. Does any part of the dispersant application apparatus show signs of wear, damage, or deterioration that could prevent the dispersant applicator from operating as designed or create a safety hazard for the operator and/or crew?</p>	<p>Comments:</p>		<p><input type="checkbox"/> N/E</p>		
<p>Document results from Tier II Performance testing below. Only one OSPD tracking number shall be used per Tier II test. Utilize the results section below for any follow-up conducted at a later date.</p>					
Verification Results		Verification Results		Verification Results	
<p>Date:</p>		<p>Date:</p>		<p>Date:</p>	
<p><input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail</p>	<p>Comment:</p>	<p><input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail</p>	<p>Comment:</p>	<p><input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail</p>	<p>Comment:</p>

Supplemental Checklist H: Temporary Storage Device	
OSP Tracking Number:	
Completed by:	
Equipment Location (facility/depot):	Initial Result: <input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail
Equipment Name and Type:	Comments:
Equipment ID Number:	
Oil Spill Equipment Preparedness Verification Evaluation	
H1. Check all that apply or write-in included support systems:	Comments:
<input type="checkbox"/> Trailer	
<input type="checkbox"/> Other:	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable (N/A) <input type="checkbox"/> Not Evaluated (N/E)
H2. Is the temporary storage device transport trailer in satisfactory condition?	Comments:
H3. Is the temporary storage device stored properly and protected from the elements in a way that minimizes, to the greatest extent practicable, damage to the equipment?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E
H4. Lifting (tie down and tow points): Does rope of any kind show signs, as applicable, of deterioration, abrasion, wear dry rot, rust, or damage; i.e., conditions that would reduce its strength?	Comments:
H5. Barges and Bladders: Do the devices show evidence, as applicable, of damage from impacts, exposure to chemicals, degradation from environmental conditions, excessive wear, brittleness, rust, or other problems that would impact the buoyancy of the device or its ability to contain oil?	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E
H6. If condition and operability of devices is in question, the operator(s) should be requested to test the barges, fill tanks with water, or inflate bladders with air to verify their ability to perform as designed.	Comments:
H7. For vessel Temporary Storage Device's (TSDs), does any part of the vessel show signs of fatigue damage, faulty design, or deterioration that could result in spillage of the collected oil or create safety hazards for the operator.	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E
	Comments:

Document results from Tier II Performance testing below. Only one OSPD tracking number shall be used per Tier II test. Utilize the results section below for any follow-up conducted at a later date.

Verification Results		Verification Results		Verification Results		Verification Results	
Date:		Date:		Date:		Date:	
<input type="checkbox"/> Pass	Comment:						
<input type="checkbox"/> Unavailable		<input type="checkbox"/> Unavailable		<input type="checkbox"/> Unavailable		<input type="checkbox"/> Unavailable	
<input type="checkbox"/> Repaired		<input type="checkbox"/> Repaired		<input type="checkbox"/> Repaired		<input type="checkbox"/> Repaired	
<input type="checkbox"/> Fail		<input type="checkbox"/> Fail		<input type="checkbox"/> Fail		<input type="checkbox"/> Fail	

Supplemental Checklist I: Equipment Not Otherwise Categorized	
Equipment Location (facility/depot):	OSPD Tracking Number:
Equipment Name and Type:	Completed by:
Equipment ID Number:	Initial Result: <input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail
Oil Spill Equipment Preparedness Verification Evaluation	
Corrective Action Determination and Comments	
11. Write-in any additional support equipment that is part of this evaluation:	
12.	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Applicable (N/A) <input type="checkbox"/> Not Evaluated (N/E) Comments:
13.	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:
14.	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:
15.	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:
16.	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:
17.	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:

18.	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:	
19.	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:	
110.	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:	
111.	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:	
112.	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:	
113.	Corrective Action? <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> N/E Comments:	
Document results from Tier II Performance testing below. Only one OSPD tracking number shall be used per Tier II test. Utilize the results section below for any follow-up conducted at a later date.		
Verification Results	Verification Results	Verification Results
Date: _____ <input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail Comment: _____	Date: _____ <input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail Comment: _____	Date: _____ <input type="checkbox"/> Pass <input type="checkbox"/> Unavailable <input type="checkbox"/> Repaired <input type="checkbox"/> Fail Comment: _____

J3. Additional comments from checklist item number:

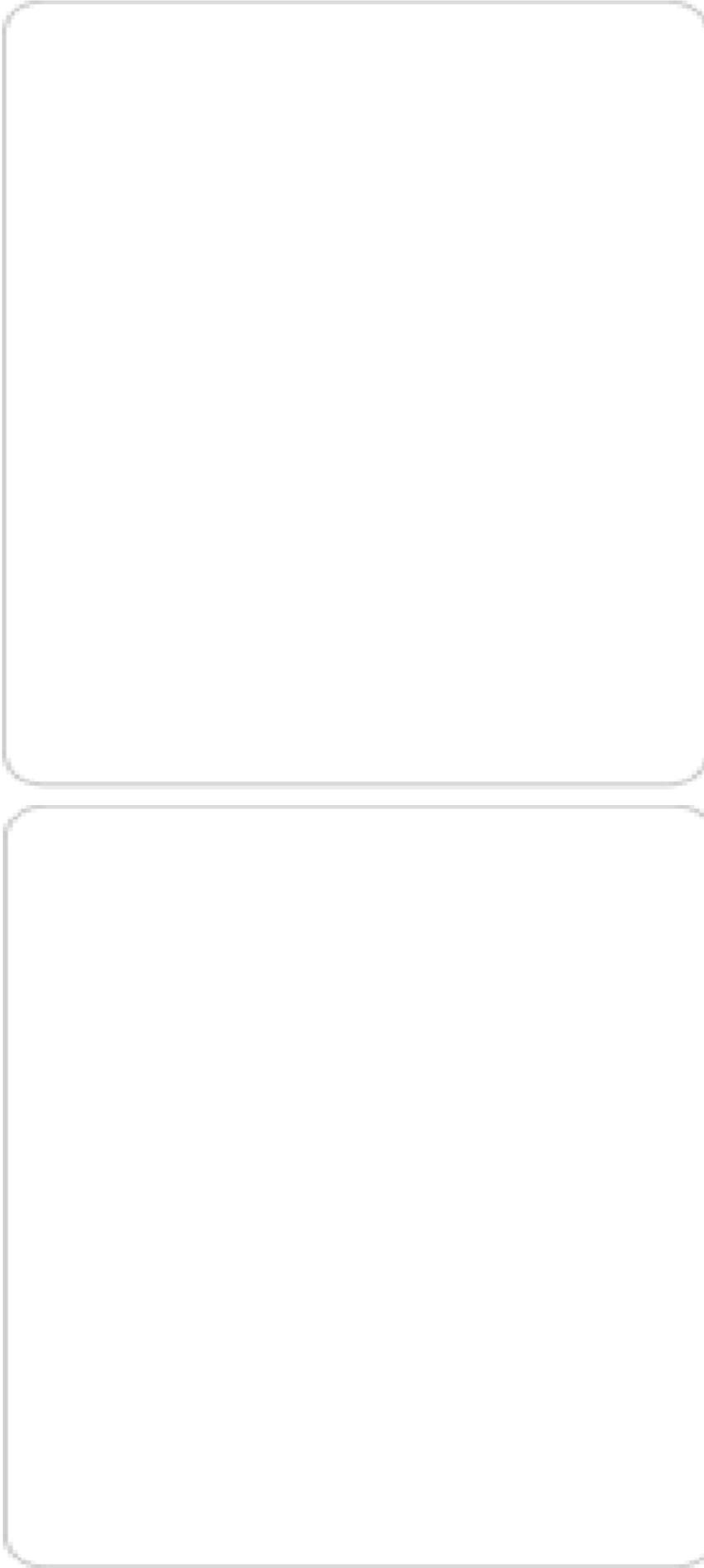
J4. Additional comments from checklist item number:

OSPD Photo Log

Date/Time:

OSPD Tracking Number:

Photographer(s):



Picture #:

Date:

Description:

Person(s) Photographed:

Photographer:

Picture #:

Date:

Description:

Person(s) Photographed:

Photographer:

NOTE: All photos must have a resolution of at least 8 megapixels or greater to be part of the administrative record.

Page ____ of ____

EVC Control Sheet

Docket #:	OSRP Name:	
OSPD Tracking #:	Date:	
OSRO:	City, State:	
<input type="checkbox"/> Inventory Only	<input type="checkbox"/> Inventory and Verification	<input type="checkbox"/> Joint Preparedness Verification
Tier I: Requested date:	Received date:	Completed date:
Tier II: <input type="checkbox"/> Passed	<input type="checkbox"/> Failed	<input type="checkbox"/> Unavailable
Comment:		
Tier III: Date:		
Comment:		
Enforcement referral:	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Conducted by:		

Incident Response and Notification Capability: Appendix Reference

Appendix CC Incident Preparedness Analysis Data Sheet..... CC I 13

Appendix DD IRC Control Sheet..... DD I 15

OSPD Tracking No. _____

Incident Preparedness Analysis Data Sheet

Incident Response:		Incident Preparedness Analysis Type: Part I <input type="checkbox"/> Part II <input type="checkbox"/> Both <input type="checkbox"/>		NRC #	State Spill Report #
Incident Date:	IPA Initiated Date:	OSRP Name:		Location: (Physical Address or GPS coordinates)	
Pollution Preparedness Analyst(s):					
Summary of Findings and Potential Non-Compliance Citation(s): check all that apply					
#1	<input type="checkbox"/> 30 CFR §254. _____	#2	<input type="checkbox"/> 30 CFR §254. _____	#3	<input type="checkbox"/> 30 CFR §254. _____
<input type="checkbox"/> OSRP Revision Tracking Number:	<input type="checkbox"/> OSRP Revision Tracking Number:	<input type="checkbox"/> OSRP Revision Tracking Number:	<input type="checkbox"/> OSRP Revision Tracking Number:	<input type="checkbox"/> OSRP Revision Tracking Number:	<input type="checkbox"/> OSRP Revision Tracking Number:
<input type="checkbox"/> Enforcement OSPD Tracking Number:	<input type="checkbox"/> Enforcement OSPD Tracking Number:	<input type="checkbox"/> Enforcement OSPD Tracking Number:	<input type="checkbox"/> Enforcement OSPD Tracking Number:	<input type="checkbox"/> Enforcement OSPD Tracking Number:	<input type="checkbox"/> Enforcement OSPD Tracking Number:
<input type="checkbox"/> Corrective Action Recommendation	<input type="checkbox"/> Corrective Action Recommendation	<input type="checkbox"/> Corrective Action Recommendation	<input type="checkbox"/> Corrective Action Recommendation	<input type="checkbox"/> Corrective Action Recommendation	<input type="checkbox"/> Corrective Action Recommendation
Narrative:					

Incident Preparedness Analysis Corrective Action Recommendations						
#	Oil Pollution Incident Preparedness Analysis: Action Items				Compliance Verification Method	
1					<input type="checkbox"/> INC	<input type="checkbox"/> OSRP Revision <input type="checkbox"/> Recommendation Only
					<input type="checkbox"/> INC	<input type="checkbox"/> OSRP Revision <input type="checkbox"/> Recommendation Only
2					<input type="checkbox"/> INC	<input type="checkbox"/> OSRP Revision <input type="checkbox"/> Recommendation Only
					<input type="checkbox"/> INC	<input type="checkbox"/> OSRP Revision <input type="checkbox"/> Recommendation Only
3					<input type="checkbox"/> INC	<input type="checkbox"/> OSRP Revision <input type="checkbox"/> Recommendation Only
					<input type="checkbox"/> INC	<input type="checkbox"/> OSRP Revision <input type="checkbox"/> Recommendation Only
4					<input type="checkbox"/> INC	<input type="checkbox"/> OSRP Revision <input type="checkbox"/> Recommendation Only
					<input type="checkbox"/> INC	<input type="checkbox"/> OSRP Revision <input type="checkbox"/> Recommendation Only

OSPD Tracking No. _____

IPA Checklist

Requirements	Record Observations, Provide Compliance Evidence and Comments
<p>NRC/Incident report:</p> <ul style="list-style-type: none"> • Is the incident report accurate and complete? • Is the spill one barrel or more? • Is the spill 50 barrels or more? <p>Witness statements: (if applicable)</p> <ul style="list-style-type: none"> • Are witness statements available and complete? • Confirm details with witnesses. • Any other records from witnesses; e.g., photos. <p>Risk assessment/Job safety analysis Completed, approved, and available as described in their OSRP?</p>	<p><i>Attach original and updated (if required) incident reports</i></p> <p><i>Attach record of conversation, witness statements, photos</i></p> <p><i>Attach risk assessment, evidence of implementation</i></p>
<p>Documents/Records:</p> <ul style="list-style-type: none"> • Event logs, task requests, record of conversations, briefs or debriefs. • Policies, procedures, incident action plans. • Evidence of required document(s) availability and use. <p>Incident Timeline: (as necessary)</p> <ul style="list-style-type: none"> • Obtain from BSEE Region or District Field Offices the sequence of events that lead to the incident. • Sequence of events following the incident. <p>Non-Compliance Analysis:</p> <ul style="list-style-type: none"> • Sequence of events leading to non-compliance. • Relative significance of causes for non-compliance. • Risk assessment of non-compliance reoccurring. <p>System Improvements: Recommendations for addressing non-compliance:</p> <ul style="list-style-type: none"> • Regulatory/Notice to Lessees interpretation. • Oil Spill Response Plan (OSRP) revision. • OSRP implementation. • Contractor monitoring and evaluation. • Drill/Exercise review and improvement. <p>Non-Adoption Risk Assessment:</p> <ul style="list-style-type: none"> • Potential effect of another similar incident (on response personnel, response organization, etc.). • Relative significance of incident causes and effects. <p>Enforcement recommendations</p> <ul style="list-style-type: none"> • Review any documented historical noncompliance. • Review any incidents of noncompliance or other violations. • See Enforcement Standard Operating Procedures document for enforcement recommendation(s). • Complete Non-compliance Record. 	<p><i>Attach documents/records or list documents with version number/date</i></p> <p><i>Attach risk assessment</i></p> <p><i>Attach risk assessment</i></p> <p><i>Attach incident investigation report</i></p>

IRC Control Sheet

Docket #:

OSRP Name:

OSPD Tracking #:

Date:

Incident/ Response:

NRC#:

State Spill Report #:

Activity Date:

Location/GPS Coordinates:

Enforcement Activity Code:

Conducted by:

Reviewed by:

Standard Operating Procedure (SOP) for Enforcement: Appendix Reference

Appendix EE ENF Control Sheet.....	EE 17
Appendix FF Non-compliance Record Template.....	FF 18

OSPD NON-COMPLIANCE RECORD: #I-02945-20140815
GULF OIL SPILL PREPAREDNESS SECTION

Type of Violation: Failed to submit an Oil Spill Response Plan as per 30 CFR 254.1
Date Submitted: August 15, 20XX

1. Violator:
(Operator of Facility)
XXX Street, Suite X
Houston, Texas 77002
Business Phone: (999) 999-9999
Operator Representative: Mr. X Representative

2. Location of Violation:
N/A

3. Nature of the Violation:
Following a review of BSEE records for (Operator), it was discovered that the Operator failed to submit an Oil Spill Response Plan (OSRP) for facilities located seaward of the coast line as required by 30 CFR 254.1.

First violation: Operating facilities without an approved regional Oil Spill Response Plan [30 CFR 254.1]

4. Other Information:
BSEE records indicated that Operator (BSEE ID 00000) is the owner/operator of facilities that are seaward of the coast line (Attachment 1).

You must submit a response plan that covers your facilities located seaward of the coast line that have not been physically removed or abandoned and are currently storing, transmitting, or handling oil in accordance with 30 CFR 254.1. You may also certify in writing to the OSPD Branch Supervisor that you have the capability to respond to the maximum extent practicable to a worst case discharge or a substantial threat of such a discharge per 30 CFR 254.2(b).

5. Compliance Reviewer:
(BSEE Senior Preparedness Analyst)
Bureau of Safety and Environmental Enforcement
Oil Spill Preparedness Division, Preparedness Verification Branch
New Orleans, LA 70123
Phone: (504) 736-9999

6. Requirement for Corrective Action:

As per the attached INC, OSPD is requiring (the Operator) to submit an OSRP per 30 CFR 254.1 for any facilities have not been physically removed or abandoned and are currently storing, transmitting, or handling oil and ensure they maintain compliance with the regulations in the future.

8. Attachments:

BSEE INC Form BSEE-1832: ENF ID#

The information in this Non-Compliance Record is complete and accurate to the best of my knowledge, information, and belief.

OSPD Senior Preparedness Analyst

I recommend filing an action against the violator(s) described above.

OSPD Preparedness Verification Branch, Gulf Oil Spill Preparedness Section Supervisor

Date

ATTACHMENT 1

BSEE's Office of Offshore Regulatory Programs, Oil Spill Preparedness Division, Environmental Enforcement Division, regional offices, Office of Administration and directorate offices carry out the key functions of the bureau. BSEE has offices in the Alaska, Pacific and Gulf regions, in Sterling, VA and in Washington, D.C.

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