



EPA Unannounced PREP Exercises



What to Expect During an
EPA-led Unannounced Exercise



Introduction

- Unannounced Exercises are mandated by OPA
- Follow guidelines in the National Preparedness for Response Exercise Program (PREP)
- PREP was developed to establish an exercise program which 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)



PREP

- Mechanism for meeting pollution response requirements of the Oil Pollution Act of 1990
- Provides opportunity for continuous improvement of response readiness
- Developed in a unified federal effort involving:
 - Coast Guard
 - Environmental Protection Agency
 - DOT Research and Special Programs Administration
 - DOI Minerals Management Service

Will I Be Exercised?

- Unannounced
- Randomly Target Facility Response Plan (FRP) holders
- May receive a notice of "Intent to Exercise"
 - **Then, again-maybe not!**





Basics of the Scenario

SCOPE:

- Duration: 4 hours or less
- EPA Small Discharge (2,100 gallons or less) to a navigable water or adjoining shoreline
- Equipment deployment
- For EPA-regulated facilities, exercises are limited to 10% of the plan holders per EPA Region per year

OBJECTIVES:

- Notifications
- Timely (as required in 112.20 Appendix E)
- Adequate amount of equipment
- Properly conducted



Objectives

- 40 CFR 112 Appendix E Section 3.3
The response resources shall, as appropriate, include:
 - 3.3.1 One thousand feet of containment boom and a means of deploying it within 1 hour of the discovery of a discharge;
 - 3.3.2 Oil recovery devices which is available at the facility within 2 hours of the detection of an oil discharge; and
 - 3.3.3 Oil storage capacity for recovered oily material indicated.

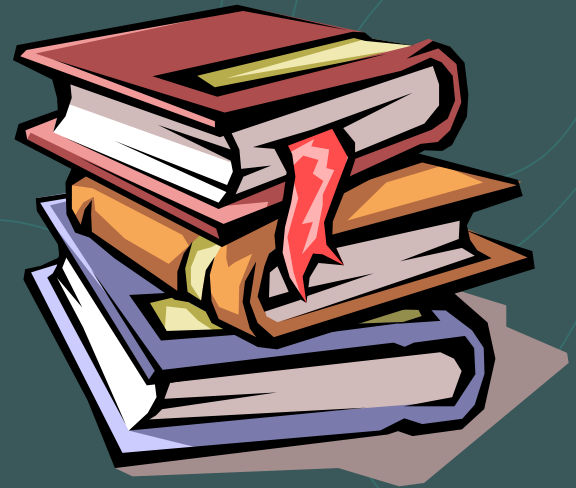
Source of Release



During the Exercise

Looking to see FRP Implementation:

- Is the Plan available? Updated?
- Using Emergency Response Action Plan (ERAP)?
- Initial Response Actions
- Booming Strategies Considered?





Who Responds?

- Response conducted as identified in the FRP
- The facility can use the Spill Management Team or their dedicated Oil Spill Removal Organizations (OSROs).
- Whatever is required to respond to a small discharge.

Implement Emergency Procedures



Know Where It Goes



Know Where It Goes



Notifications

- 1. National Response Center (NRC): 1-800-424-8802
- 2. Qualified Individual
- 3. Company Response Team
- 4. Federal On-Scene Coordinator (OSC) and/or Regional Response Center (RRC)
- 5. Local Response Team (Fire Dept./Cooperatives)
- 6. Fire Marshall
- 7. State Emergency Response Commission (SERC)
- 8. State Police
- 9. Local Emergency Planning Committee (LEPC)
- 10. Local Water Supply System
- 11. Weather Report
- 12. Local TV/Radio Station for Evacuation Notification
- 13. Hospitals



Equipment



Equipment



Know How to Use the Equipment



Access



Contain



Contain



Recover



Storage Capacity for Recovered Oil



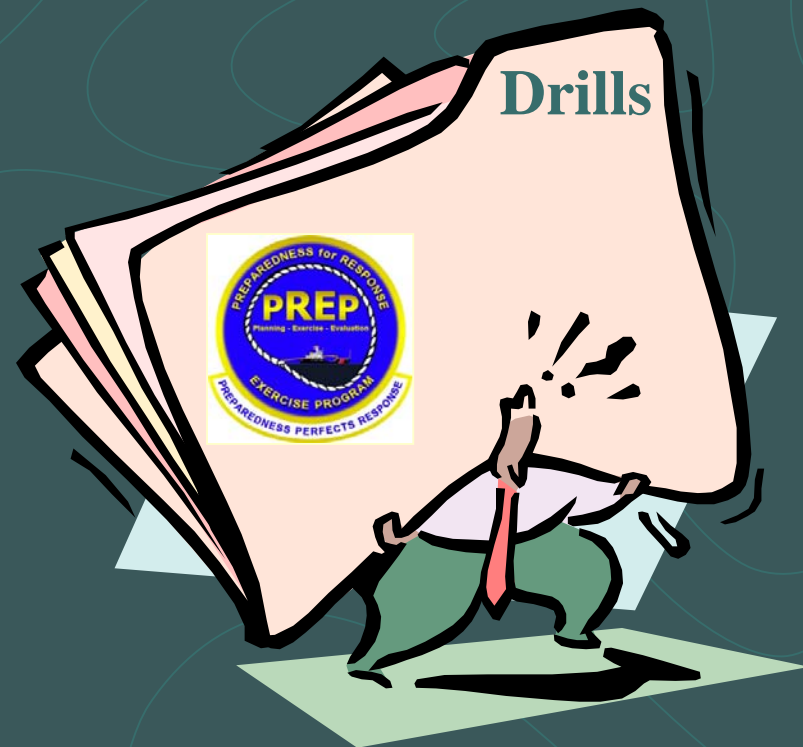
Safety Considerations

- No operations in unsafe or illegal manner during an exercise or actual response



Document! Document! Document!

- Records of exercises must be maintained at the facility
- Follow-up documentation by EPA personnel





Summary

- Evaluate plan holder's response readiness during initial response
- Involve response to a small discharge (including equipment deployment.)
- Assessed based on:
 - Proper notifications
 - Timely response
 - Equipment deployment
 - Properly Conducted

Conclusions

● Successful Completion

- Will not be subject to another unannounced exercise for 3 years
- Documented exercise counts toward internal exercise requirements

● Benefits

- Improved Response Capability
- Cooperation among Industry, OSRO and Government

