

Triennial Exercise of the Entire Response Plan

Every three years all components of the entire response plan must be exercised. Rather than requiring each plan holder to conduct a major exercise every three years, the PREP allows for the individual components to be exercised in portions through the required exercises. The following basic types of plan components must be exercised at least every three years:

- Organizational Design;
- Operational Response; and
- Response Support.

Area Exercises

The purpose of the area exercise is to exercise the entire response community in a particular area. An area is defined as "that geographic area for which a separate and distinct Area Contingency Plan has been prepared, as described in OPA 90." The response includes the federal, state, and local government and industry. The area exercises are designed to exercise the government and industry interface for spill response.

The area exercises do not necessarily have to be large scale productions. The scenario does not always have to involve a worst case discharge. The primary purpose of the area exercise is to activate and observe the response infrastructure in the area, and the ability of the entire response community to effectively conduct a spill response. The focus should be on interaction between the responsible party and the federal, state, and local government to exercise both the Area Contingency Plan and the responsible party's plan. There may be some level of equipment deployment; whatever is appropriate for the scenario. Plan holders are responsible for funding their participation in the area exercises.

Other Credit Issues

Credit for Spill Response. Plan holders may take credit for internal exercises conducted in response to actual spills. The spill response must be evaluated and the plan holder must determine which exercises were completed during the response. This determination should be based on whether the response effort would meet the objectives of the exercise as listed in the PREP guidelines.

Proper Documentation for Self-Certification. Proper documentation for self-certification should include, as a minimum, the following information:

- Type of exercise,;
- Date and time of the exercise;
- A description of the exercise;
- The objectives met;
- The components of the response plan exercised; and
- Lessons learned.

Oil or Chemical Spill Notification

call the National Response Center at
800-424-8802

Oil Spill Response

in the Caribbean Region Coastal Zone,
Sector San Juan, PR
787-289-2041

In the Caribbean Region Inland Zone,
contact the U.S. EPA Environmental
Protection Division in Puerto Rico:
787-977-5870

Commonwealth, Territory, and Neighboring
Nation Pollution Response Contacts are:

Puerto Rico Environmental Quality Board
787-766-2823

Puerto Rico Emergency Response Office
787-724-0824

U.S. Virgin Islands Dept. of Planning & Natural
Resources
809-774-3320

U.S. Virgin Islands Emergency Management Agency

St. Thomas 809-774-2244
St. Croix 809-773-2244

British Virgin Islands Office of Disaster Preparedness
284-494-4499

National Preparedness for Response Exercise Program (PREP)



Caribbean Region
Regional Response Team

Co-Chairs:

U.S. Coast Guard 305-415-6860

U.S. EPA 732-321-6656

Other informational pamphlets are available through
the Caribbean RRT Web Site at www.nrt.org

What is the Purpose of PREP?

The National Preparedness for Response Exercise Program (PREP) was developed to establish a workable 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 Clean Water Act (CWA), by adding a new subsection for spill response preparedness (33 USC 1321(j)(7)). The PREP 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. The PREP is a unified federal effort and satisfies the exercise requirements of the Coast Guard, the Environmental Protection Agency (EPA), the Research and Special Programs Administration (RSPA), the Office of Pipeline Safety, and the Minerals Management Service (MMS). Completion of the PREP exercises will satisfy all OPA 90 mandated federal oil pollution response exercise requirements.

At this time, the PREP addresses the exercise requirements for oil pollution response only. Regulations for hazardous substance releases are currently under development and once completed, the hazardous substance exercise requirements will be incorporated into the PREP.

The PREP represents the **minimum** guidelines for ensuring adequate response preparedness. If personnel within an organization believe additional exercises or an expansion of the scope of the PREP exercises are warranted to ensure enhanced preparedness, they are **highly encouraged** to conduct these exercises.

The PREP 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 changes to the response plans necessary to ensure the highest level of preparedness.

Participation in PREP

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. The PREP satisfies these requirements. **The PREP is a voluntary program.** Plan holders are not required to follow the PREP guidelines and, if they choose not to, may develop their own exercise program that complies with the regulatory exercise requirements.

Applicability of PREP

The PREP is applicable to all industry response plan holders who elect to follow these guidelines. Area Contingency Plan holders are required to follow the PREP guidelines.

Industry plan holders electing not to adopt the RPE as their exercise program will be responsible for developing and documenting an exercise program that satisfies the appropriate federal oversight agency.

Internal and External Exercises

Internal Exercises. Internal exercises are those that are conducted wholly within the plan holder's organization. While the internal exercises include personnel such as the qualified individual and those affiliated with the Oil Spill Removal Organization (OSRO), the internal exercise usually do not involve other members of the response community. The internal exercises are designed to examine the various components of the response plan to ensure the plan is adequate to meet the needs of the organization for spill response.

The internal exercise include:

- Qualified Individual notification exercises;
- Emergency procedures exercises for vessels and barges;
- Emergency procedures exercises for facilities (optional);
- Spill Management Team (SMT) tabletop exercises; and
- Equipment deployment exercises.

All internal exercises should be self-evaluated and self-certified.

External Exercises. External exercises are exercises that extend beyond the internal focus of the plan holder's organization and involve other members of the response community. The external exercises are designed to examine the response plan and the plan holder's ability to coordinate with the response community to conduct an effective response to a pollution incident. The external exercises include:

- Area exercises; and
- Government-initiated unannounced exercises.

While the government-initiated unannounced exercises will not usually involve all members of the response community, the involvement of an agency outside of the plan holder's organization places it in the category of an external exercise.

Qualified Individual Notification Exercises. The purpose of the Qualified Individual notification exercise is to ensure that the Qualified Individual is able to be reached in a spill response emergency to carry out his/her required duties. Contact by telephone, radio, message-pager, or facsimile must be made with the Qualified Individual, and confirmation must be received from him/her to satisfy the requirements of this exercise. This exercise is not intended to verify phone numbers, point of contact, or notification lists contained in the plan. Those actions should be updated periodically by the plan holder. At least once per year, the Qualified Individual notification exercise should be conducted during non-business hours.

Emergency Procedures Exercises. The purpose of the emergency procedures exercises is to ensure that personnel are capable of conducting the initial actions necessary to mitigate the effects of a spill.

Spill Management Team (SMT) Tabletop Exercises. The response plan holder must identify a SMT in the response plan. This SMT shall conduct an annual tabletop exercise, in accordance with the PREP guidelines. The response plan must be utilized in the exercise to ensure the SMT is familiar with the plan and is able to use it effectively to conduct a spill response. At least one SMT tabletop exercise in a triennial cycle shall involve a worst case discharge scenario.

Equipment Deployment Exercises. The equipment deployment exercise applies to all plan holders. It is the responsibility of the plan holder to ensure that the Equipment Deployment Exercise requirement is met. The two primary requirements for the equipment deployment exercise are:

- The personnel that would normally operate or supervise the operation of the response equipment must participate in the exercise. The personnel must demonstrate their ability to deploy and operate the equipment. All personnel involved in equipment deployment and operation must be involved in a training program; and
- The response equipment must be in good operating condition. The equipment must be appropriate for the intended operating environment. The equipment must operate during the exercise. All response equipment must be included in a maintenance program.

Internal Unannounced Exercises. This is NOT a separate exercise. However annually, each plan holder should ensure that one of the above described internal exercises is conducted unannounced. An unannounced exercise is where the exercise participants do not have prior knowledge of the exercise, as would be the situation in an actual spill incident. To ensure that the nation maintains an adequate posture for response preparedness and to satisfy the OPA 90 requirement for unannounced exercises, it is necessary to have an exercise program which is comprised of both announced and unannounced exercises. Response to an actual spill should be taken as credit for the unannounced exercise requirement, if the response was evaluated. The emergency procedures exercise is being offered as an option for facilities, to provide an additional exercise that may be conducted unannounced.

Government-Initiated Unannounced Exercises. The government-initiated unannounced exercise 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. A plan holder directed to participate in a government-initiated unannounced exercise is required to participate as directed. The cost of the unannounced exercise would be borne by the response plan holder.