

Guidelines for Oil Spill Response Training and Exercise Programs

Guidance for Spill Management Teams and Oil Spill Responders

API TECHNICAL REPORT 1159
JULY 2014



AMERICAN PETROLEUM INSTITUTE

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1 Introduction

1.1 Purpose

API's ***Guidelines for Oil Spill Response Training and Exercise Programs*** (Guide) is intended to provide organizations with information on developing an **Oil Spill Response Training and Exercise Program** for oil Spill Management Teams and operational oil spill response personnel.

A robust and comprehensive training and exercise program is an important element of an organization's oil spill preparedness and response capability. Such a program will provide personnel with the knowledge and skills necessary to safely and effectively respond to oil spills and demonstrate that capability through a variety of exercises. An effective program will be flexible and scalable to maintain an adequate level of preparedness over time as the organization's oil spill risk profile changes.

1.2 Applicability and Scope

This Guide is designed for organizations and personnel that have oil spill response plans, respond to oil spills, operate oil spill response equipment, and/or have oil spill response management or oversight responsibilities. This Guide may be applied to organizations of any size, from multi-national corporations to small businesses. It may be applied to private sector and non-governmental organizations, or any other type of organization with oil spill response requirements. Any applicable organization may use this Guide as a reference, and tailor its implementation in accordance with their own unique characteristics.

This Guide may be applied to oil spill preparedness programs, regardless of the size, scope or location of oil spill risk. This includes spills in the marine environment, inland waters, on land, or any combination of locations. This Guide may be applied to spills of any type of oil, including crude oils, refined oil products and animal/vegetable oils.

Although primarily designed around U.S. standards and terminology, this Guide should be considered useful for designing oil spill training and exercise programs for all organizations regardless of national identity or geographic location.

1.3 Regulatory Requirements

The definitions, content and suggestions in this Guide were developed to be consistent with U.S. Federal regulatory requirements based on the current revision date; however, this is not a regulatory compliance document. Organizations should review their entire regulatory environment, including International, Federal, State and Local requirements, when designing their specific training and exercise program.

1.4 Definitions of Terms Used in This Guide

Term	Meaning
Asset/Facility	Any oil well, vessel, aircraft, platform, Mobile Offshore Drilling Unit, pipeline, or oil storage/handling/processing facility covered by the organization's Oil Spill Response Plan.
Drill	A drill is a type of exercise. A drill is a focused and repetitious exercise, very disciplined, used as a means of teaching and perfecting specific response skills or procedures.
Exercise	An exercise is a structured and supervised activity used to develop or maintain fitness or increase skill. Exercises are an opportunity to validate an organization's oil spill response capabilities through simulated response to an oil spill scenario. Exercises can be used for testing and validating policies, plans, procedures, training, equipment, and third-party agreements; clarifying and training personnel in roles and responsibilities; improving team coordination and communications; improving individual performance; identifying gaps in resources; and identifying opportunities for improvement.
Crisis/Incident Management Team*	The persons identified who respond to any type of emergency event, including oil spills, at the highest level of the organization's management structure. The Crisis/Incident Management Team may assume the role of a Spill Management Team, or maintain a separate response management function that focuses on ancillary impacts to the organization.
Oil Spill Response Plan	The document(s) that contains information, procedures and guidance on how the organization would respond to an oil spill from a covered asset/facility.
Spill Management Team*	The persons identified who staff the organization responsible for leading and managing the oil spill response. The Spill Management Team is led by an Incident Commander, and typically follows the Incident Command System (ICS) organizational structure. This team may be physically co-located, or coordinate virtually.
Spill Response Operators	The persons who deploy and operate oil-spill response equipment, and/or contribute skills and services to support tactical oil spill response operations. Also known as the <i>Spill Response Operating Team</i> .
Source Control	The act of stopping the discharge of oil from the source of the spill.
Training	The process of bringing a person to an agreed standard of proficiency by practice and instruction.
Qualified Individual	As defined under the applicable regulations of the U.S. Oil Pollution Act of 1990, the person designated by the organization to initiate an oil spill response.

* The names and types of response teams will vary among different organizations, depending on their complexity and regulatory environment. It is not the intent of this Guide to suggest how organizations name their various response teams, but to generally refer to any team that is responsible for managing oil spill response as a **Spill Management Team** and the personnel that deploy spill equipment as a **Spill Response Operators**.

1.5 References

The following regulations and documents were reviewed and considered during the development of this Guide. Organizations may use these references for further guidance and suggestions when developing their oil spill response training and exercise program.

U.S. Federal Regulatory References on Oil Spill Response Training and Exercises

Agency	Citation
Bureau of Safety and Environmental Enforcement (BSEE)	30 CFR 254.41—Training your response personnel. (Offshore Oil Spill Response Plans) 30 CFR 254.42—Exercises for your response personnel and equipment. (Offshore Oil Spill Response Plans)
Environmental Protection Agency (EPA)	40 CFR 112.7(f) —Personnel training (SPCC Plans) 40 CFR 112.21—Facility response training and drills/exercises (Facility Response Plans) 40 CFR Part 300—U.S. National Oil and Hazardous Substances Pollution Contingency Plan
Occupational Safety and Health Administration (OSHA)	29 CFR 1910.120—Hazardous waste operations and emergency response (HAZWOPER)
Pipeline and Hazardous Materials Safety Administration (PHMSA)	49 CFR 194.107(c)(1)(ix)—Drill program (Response Plans for Onshore Oil Pipelines) 49 CFR 194.117—Training (Response Plans for Onshore Oil Pipelines)
U.S. Coast Guard (USCG)	33 CFR 154.1050—Training (Facility Response Plans), also see Appendix D 33 CFR 154.1055—Exercises (Facility Response Plans) 33 CFR 155.1055—Training (Tank Vessel Response Plans), also see Appendix C 33 CFR 155.1060—Exercises (Tank Vessel Response Plans) 33 CFR 155.5055—Training (Non-tank Vessel Response Plans) 33 CFR 154.5060—Exercises (Non-tank Vessel Response Plans) 33 CFR 155.5061—Alternative Training and Exercise Program (Non-tank Vessel Response Plans)

Oil Spill Response Training and Exercise Reference Publications

Organization	Publication
API	Guidelines for Offshore Oil Spill Response Plans, September 2013
IPIECA	Guide to Tiered Preparedness and Response, 2007
ITOPF	Contingency Planning for Marine Oil Spills, 2011
BONN (North Sea States)	Bonn Agreement Aerial Operations Handbook
National Fire Protection Association (NFPA)	U.S. NFPA 1600 (Standard on Disaster/Emergency Management and Business Continuity Programs), 2007
U.S. Coast Guard (USCG)	Contingency Preparedness Planning Manual Volume III Exercises (COMDINST M3010.13B)
U.S. Coast Guard (USCG)	Incident Management Handbook, 2014
U.S. Coast Guard (USCG)	U.S. National Preparedness for Response Exercise Program (PREP) Guidelines, August 2002
U.S. Department of Homeland Security (DHS)	U.S. Homeland Security Exercise and Evaluation Program (HSEEP), April 2013
U.S. Department of Homeland Security (DHS)	National Incident Management System (NIMS) Training Program, September 2011
U.S. Department of Labor Occupational Safety and Health Administration (OSHA)	3172 2001 Training Marine Oil Spill Response Workers Under OSHA's Hazardous Waste Operations
U.S. DOT/USCG/EPA	Training Reference for Oil Spill Response, August 1994

1.6 Keys Principles of This Guide

This Guide was developed in accordance with the following key principles. Organizations should adjust their application of the Guide as needed based on their unique standards and requirements.

Key Principles:

1. The term “**organization**” refers to the company or entity attempting to establish or maintain an oil spill response training and exercise program.
2. The organization is conducting operations and/or owns assets involving any of the following:
 - Oil exploration
 - Oil production
 - Oil handling/processing and/or storage
 - Oil transportation (pipeline, vessel, rail, truck, etc.)
3. The organization would be considered a “**Responsible Party**” for an oil spill originating from its covered operations, assets/facilities under applicable law and regulation.

4. The organization has developed and implemented an **Oil Spill Response Plan** for its assets and operations in accordance with applicable laws, regulations or its own prudence. If needed, source control plans or procedures may be included in the organization's Oil Spill Response Plan, or be a stand-alone document(s).
5. The organization is responsible for establishing and maintaining a trained and capable **Spill Management Team**, comprised of any combination of internal and external personnel.
6. The organization is responsible for having spill response operations personnel available who would mobilize and use any necessary spill containment, removal equipment and other spill response resources.
7. The organization uses the terminology and principles of the **Incident Command System (ICS)**, as described in **Appendix B, of the U.S. National Incident Management System, 2008**.
8. The organization follows, or may adopt, the **U.S. National Preparedness for Response Exercise Program (PREP) Guidelines**, or similar multi-year training and exercise program.
9. The organization's source control function is embedded within the Spill Management Team. Unless specifically referenced, source control personnel are included when referring to the Spill Management Team.

1.7 Tier Levels

Throughout this Guide, "tier levels" are used to describe the size and scope of a potential oil spill response. The tiered approach to oil spill planning and preparedness is used by U.S. and International governmental and non-governmental organizations in developing oil spill response strategies, response team structures, and training and exercise programs.

Note that tier levels are typically not associated with the volume of oil spilled. It is the overall impact of the spill, not the quantity alone, that dictates the types and amounts of resources required and the duration of cleanup operations.

This Guide recommends that organizations adopt a 3-tier oil spill response planning system, similar to the example below, in order to scale oil spill response training and exercise programs in an efficient manner.

Example Oil Spill Tier Level Descriptions

Tier Level	Description
Tier 1	Minor spills, including incipient spills that are quickly controlled, contained and cleaned up using local (onsite or immediately available) equipment and personnel resources. A Tier 1 spill would typically be resolved within a few hours or days.
Tier 2	Moderate spills requiring activation of significant regional oil spill response resources. A Tier 2 spill response may continue for several days or weeks.
Tier 3	Major spills requiring activation of large quantities and multiple types of response resources including those from out of the region, and possibly international sources. A Tier 3 spill response may continue for many weeks or months.

1.8 Team Organization

Organizations may use the team position titles and organizational structure of the Incident Command System (ICS), closely aligned with the **U.S. Coast Guard's Incident Management Handbook**. It is understood that organizations may modify their team structure to meet their specific needs, but still attempt to maintain consistency with ICS. ICS is scalable and modular, and can be used to organize each team tier level.

It is understood that Spill Management Team positions may be filled by any combination of employees, contractors or consultants. The training guidelines in this document are position-specific, and thus would apply to any individual filling that role, regardless of their relationship to the organization.

1.8.1 Third-Party Team Members and Responders

Organizations may integrate (by contract or other means) professional oil spill removal organizations, co-operatives, private companies, consultants, individuals, and non-governmental organizations into their tactical oil spill operations and Spill Management Team.

Personnel who are oil spill responders or managers as a profession would be expected to receive training and hands-on experience necessary to fill such roles by their employer, and not necessarily follow the training and exercise program described in this document.

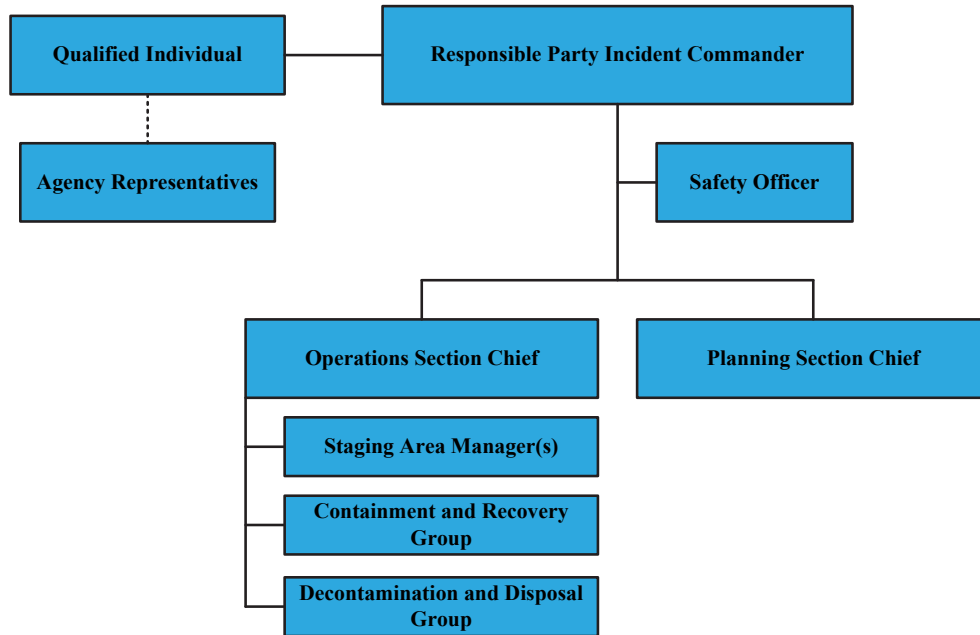
Organizations should establish or adopt a due diligence program to verify third-party personnel have adequate training and experience for the roles they will fill on the Spill Management Team or to conduct tactical oil spill operations.

1.8.2 Team Tier Levels and Training Philosophy

The following diagrams illustrate how Spill Management Teams may be organized for each Tier level, which can be used to provide the foundation for describing the organization's training program. The actual design of the organization's team levels will vary, depending on its unique requirements.

Training levels for some team positions at the Unit, Group, or Division level may not be dependent on the spill Tier, since they perform the same tasks regardless of the size and complexity of the spill. Other positions at the Command and General Staff level and Branch level require advanced training, since the complexity of managing higher tier spills requires more knowledge and skill.

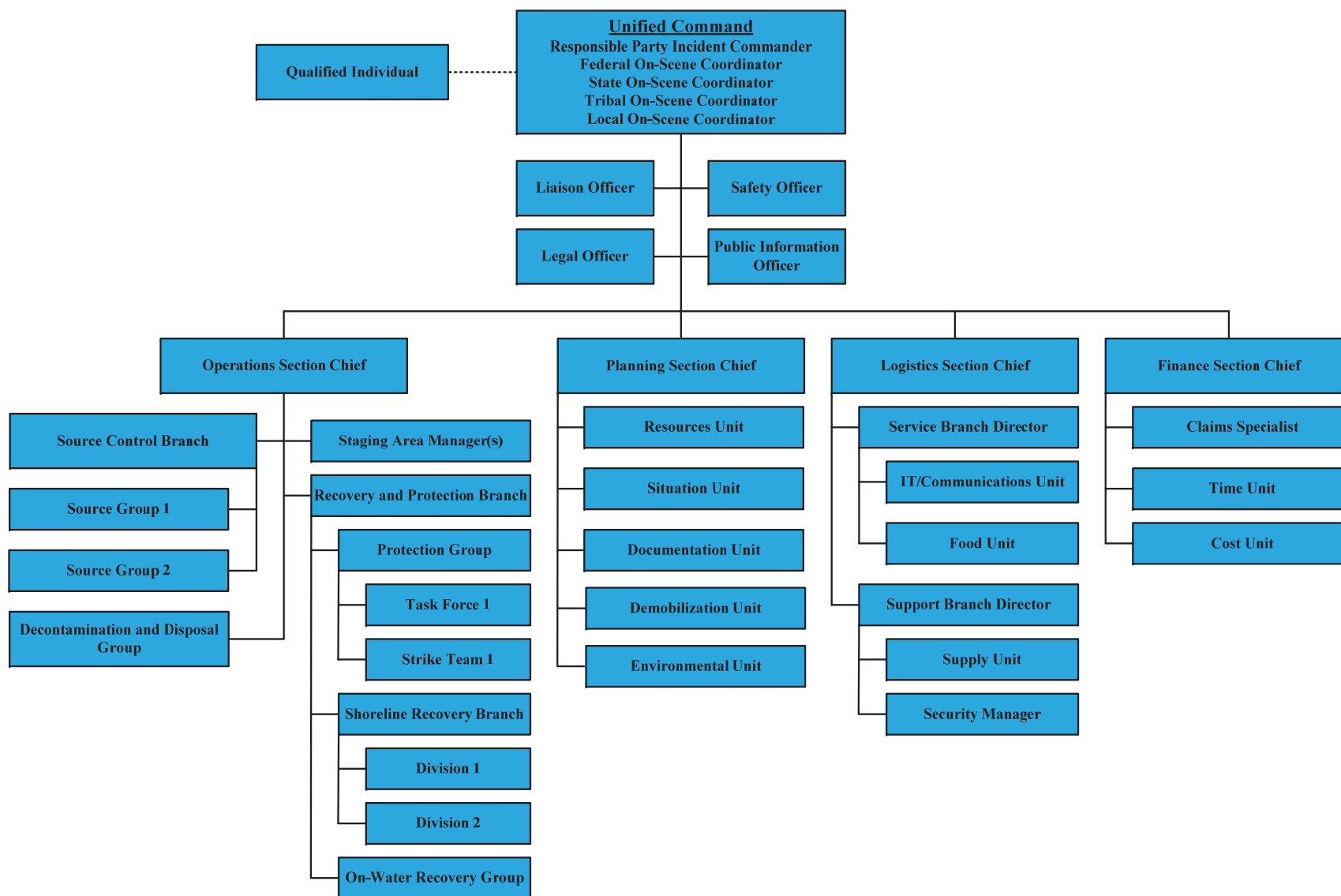
The organization should determine the organization and staffing of their Spill Management Team(s), then assign training requirements for each position based on their oil spill risk profile.

Example—Tier 1 Spill Management Team Organization

In accordance with NIMS ICS principles, the Incident Commander retains the roles and responsibilities of team positions not activated. For a Tier 1 oil spill that can be resolved with immediately available personnel and equipment, the Spill Management Team may only require a few positions. Agency personnel may briefly visit the scene for oversight, but a Unified Command may not be formally established. The Planning Section Chief, if activated, would perform all the roles of the Planning Section (Situation, Documentation, Resources, etc.) unless those Units were activated.

Training requirements for a Tier 1 team would focus on safety, basic response management skills, site-specific cleanup strategies, and tactical operations for known types of oil spills in a known operating environment. A Tier 1 team would not normally need advanced training in sustained response management techniques or a high degree of knowledge in all oil spill response strategies and tactics. Cleanup operations would typically only involve basic containment and mechanical recovery.

Example—Tier 2 Spill Management Team Organization



A Tier 2 oil spill response would typically require activation of all Spill Management Team Sections, along with all necessary branches, groups and units. Source control functions may be required. Additional Command Staff positions might be activated to address specific external or ancillary issues. The Unified Command would typically be formally established. This organization, fully staffed with alternates, would be capable of sustaining a response for an extended period of time.

Training for the Tier 2 team and spill responders would include advanced safety concepts and practices, the ability to sustain the response through multiple Planning Cycles and development of written Incident Action Plans, advanced skills in team organization, handling incident logistics, methods of incident procurement and cost-tracking, source control methods and strategies, knowledge and skills in all appropriate oil spill strategies and tactical operations, and application of technical specialties.

Cleanup operations for a Tier 2 response could involve complex containment strategies, mechanical recovery, use of dispersants, alternative cleanup technologies and shoreline protection strategies. Cleanup operations may occur on land, on-water and/or along shorelines. Wildlife recovery and rehabilitation may be required, as well as decontamination and disposal operations. The Environmental Unit may need to be activated to plan the best “net environmental benefit” response strategy and perform spill trajectory analysis.

The Tier 2 team training would also include managing ancillary issues such as media and public affairs, legal affairs, and liaison with external parties.