WASHINGTON DEPARTMENT OF ECOLOGY

Spill Prevention, Preparedness and Response

MOBILE FACILITY RESPONSE PLAN PREPARATION GUIDE

Chapter 173-180 Washington Administrative Code (WAC)

This guide is intended to help mobile facility companies prepare and use oil spill response plans. Mobile facilities are defined as rolling stock, truck, railcar, or other mobile device used to transfer oil to non-recreational vessels on Washington's waterways.

If you need this publication in an alternate format, please call Spills Program at 360-407-7455. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

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INTRODUCTION

Oil spills pose a significant risk to the state's environment and economy. Even small leaks and drips can cumulatively harm our environment. In 2004 the Washington State Legislature adopted a *zero spills* goal for the state and focused on oil transfers as a likely source of spills. In 2006, rules were adopted that set standards for facility transfers to non-recreational vessels. These rules include the requirement for mobile facilities to develop and implement oil spill response plans. This guide is a reference document for meeting this requirement. It is not intended as a substitute for reading the regulations.

Tip: Regulations can be downloaded at www.ecy.wa.gov/programs/spills/spills.html.

Who must submit response plans?

All mobile facilities that transfer oil to a non-recreational vessel must prepare and use an oil spill response plan. Most mobile fuelers are already familiar with federal requirements to develop response plans. However, unlike the federal rules which only require a response plan if you transfer to vessels with a fuel capacity of 10,500 gallons or more, the state requires a plan if you transfer to any non-recreational vessel *regardless* of the fuel capacity. The state and federal requirements are similar, and the key differences that are explained in this guide.

Tip: This guide will help you develop a plan that meets both federal requirements in 33 CFR Part 154 section F and state requirements in Chapter 173-180 WAC.

Benefits of the response planning process

Your response plan is a tool. You will be expected to use it during an actual spill response and you may find it becomes a vital part of your company's business plan.

If a spill originates from your facility, you are responsible for making notifications immediately and cleaning up the oil under state and federal pollution response laws. Good preparation may save you thousands of dollars in cleanup and liability costs, and will minimize the environmental damage.

Plan development includes more than just writing a plan. It includes collecting information, developing training programs, identifying priorities, assigning responsibilities, and making other critical management decisions. This overall process is just as valuable as the written plan itself. And this process should not stop once a plan is submitted. Regular maintenance of your plan through exercises and annual reviews will keep the process alive and maximize your preparedness.

CHAPTER 1

Getting Started

This chapter introduces you to basic response planning concepts and tasks. You should become familiar with these concepts and complete these preliminary tasks before you start writing a plan. Topics addressed include:

I. Reviewing key definitions.
II. Identifying a qualified individual.
III. Understanding the transfer containment and recovery standards.
IV. Ensuring the availability of response resources.
V. Exercise and drilling response efforts.

I. Reviewing key definitions

There are several technical terms used in the oil spill response planning field. You should develop a working knowledge of these terms before you begin writing your plan.

1. Average most probable discharge means a discharge of 50 barrels or 1 percent of the volume of the worst case discharge, whichever is less. This term that is applicable to the Coast Guard regulations.
2. Boom means flotation boom or other effective barrier containment material suitable for containment of oil discharged onto the surface of the water.
3. Certification means the documentation that a facility employee has met all requirements of an oil transfer training and certification program.
4. Class 2 facility (mobile facility) means a railroad car, motor vehicle, portable device or other rolling stock, while not transporting oil over the highways or rail lines of the state, used to transfer oil to a non-recreational vessel. This term is applicable to the state regulations.
5. Discharge means any spilling, leaking, pumping, pouring, emitting, emptying, or dumping regardless of quantity.
6. Ecology means the Department of Ecology.
7. Geographic Response Plans (GRPs) means pre-identified strategies to reduce impacts from oil spills. These strategies typically provide instructions for deployment of protective boom.
8. Maximum most probable discharge means a discharge of 1,200 barrels or 10 percent of the volume of a worst case discharge, whichever is less.
9. Navigable waters of the state means those waters of the state, and their adjoining shorelines, that are subject to the ebb and flow of the tide and/or are presently used, have been used in the past, or may be susceptible for use to transport intrastate, interstate, or foreign commerce.
10. Non-recreational vessel is defined as a vessel of any size used for monetary gain, or if leased, rented or chartered to another, is then used

for monetary gain. For example tour vessels, chartered fishing vessels, passenger vessels or chartered diving vessels would be considered non-recreational vessels. A houseboat, ski boat and other small floating craft on a rental or lease agreement and used for pleasure are considered recreational vessels.

11. Northwest Area Contingency Plan (NWACP) means state and federal policies, guidelines, and checklists that directly relate to oil spill response in Washington State.
12. Oil Transfer means a transfer of oil in bulk on or over waters of the state.
13. Owner or operator means in the case of an onshore or offshore facility, a person who owns or operates this type of facility.
14. Primary Response Contractor (PRC) means state approved oil spill response organization. The federal rules use the term "Oil Spill Response Organization" or OSRO.
15. Federal On-Scene Coordinator means the official predesignated by the Environmental Protection Agency or the U.S. Coast Guard to coordinate and direct oil spill clean-up operations.
16. State On-Scene Coordinator means the official predesignated by Washington State to coordinate and direct oil spill clean-up operations.
17. Waters of the state includes lakes, rivers, ponds streams, inland waters, underground water, salt waters, estuaries, tidal flats, beaches and land adjoining the seacoast of the state, sewers, and all other surface waters and watercourses within the jurisdiction of the state of Washington.
18. Worst case discharge means for a mobile facility, the loss of the entire contents of the container in which the oil is stored or transported.
19. Qualified Individual or "QI" means a person qualified and designated as required under 33 CFR 155, or the person with overall responsibility for oil transfer operations if not otherwise designated.

II. Identifying a qualified individual

You must designate a qualified individual and at least one alternate qualified individual. The qualified individual or alternate must be available 24 hours a day and able to arrive at a transfer location in a reasonable amount of time should a spill occur. The federal rules require that your qualified individual and alternate must:

Tip: Refer to 33 CFR Part 154.1026 for more information about qualified individuals.

- Reside in the United States.
- Speak fluent English.
- Be an expert in the contents of your facility response plan and their responsibilities under your response plan.

As a facility owner or operator, you are responsible for ensuring that your qualified individual and alternate have full authority to conduct the following activities:

- Activate the response contractor.
- Liaison with the Federal and State On-Scene Coordinators.
- Obligate funds necessary to carry out an oil spill response.

III. Transfer containment and recovery standards

Tip: The regulatory citation for Rate A/Rate B transfer rates is found in WAC 173-180-220.

The state oil transfer rules establish two rates for oil transfer containment and recovery standards (Rate "A" and "B"). You must decide which rate applies to you and then meet the transfer containment and recovery standards for that rate.

- Rate A: Oil transfer operations at a rate over five hundred gallons per minute; and
- Rate B: Oil transfer operations at a rate of five hundred gallons or less.

Mobile facilities would typically fall under Rate B classification. Transfer containment and recovery standards required for Rate B are discussed below. If you believe that you transfer at Rate A (not likely for mobile facilities), please contact Ecology for assistance in understanding the rules.

Under Rate B, you may choose to meet either the pre-booming requirements or the alternative measure requirements for each transfer. Whichever measure you choose, the personnel handling the boom must be trained in the proper use and maintenance of the boom and recovery equipment.

A. If you choose pre-booming

Prior to starting an oil transfer operation you must:

- Deploy boom so that it completely surrounds the vessel(s) and dock area directly involved in the oil transfer operation, and with a minimum stand-off of five feet away from sides of vessel. (This stand-off may be modified for short durations needed to meet a facility needs). Or the deliverer may pre-boom the portion of the vessel and transfer area which will provide maximum containment of any spill into the water.
- Periodically check the boom positioning and adjust it as necessary.
- Have the following recovery equipment available on-site:
- containers available for holding recovered oil/oily water.
- non-sparking hand scoops, shovels, and buckets available.
- enough sorbent material and storage capacity available for a two barrel oil spill appropriate for use on water and land.

In addition, within one hour of being made aware of a spill, the deliver must be able to completely deploy an additional five hundred feet of boom. This boom may be used for containment, recovery and/or protection.

B. If you choose the alternative measures to containment and recovery

Prior to starting the oil transfer operation you must:

- Have access to boom sufficient to completely surround the vessel and dock area directly involved in the oil transfer operation.

- Have the following recovery equipment available on-site:
- containers suitable for holding the recovered oil and/or oily water
- non-sparking hand scoops, shovels, and buckets
- sorbent materials and storage capacity for two barrel oil spill appropriate for use on water or land.

In addition, within one hour of being made aware of a spill the deliverer must be able to complete deployment of an additional five hundred feet of boom for containment, protection or recovery;

AND

Within two hours of being made aware of a spill, the deliverer must have an additional five hundred feet of boom available on-scene for containment, protection, or recovery.

IV. Ensuring the availability of response resources

The rules require that you ensure the availability of the oil spill response resources listed in your plan by using one or any combination of the following methods:

- A written agreement with a state approved contractor to provide the equipment. The agreement must identify and ensure the availability of necessary equipment and personnel to respond within the transfer containment and recovery standards, or

- Written certification by the facility owner or operator regarding the availability of facility personnel and equipment. The certification must state that applicable personnel and equipment are owned, operated, or under the direct control of the facility owner operator and are available to meet the transfer containment and recovery standards, or

- Active membership in a local or regional oil spill removal organization or cooperative,). This organization must identify personnel and equipment that are available to respond to a discharge.

Include copies of contracts or similar documents in your response plan. This information must be available for inspection by Ecology at all times.

Tip: A list of state approved contractors and cooperatives (Primary Response Contractors) can be located on Ecology's web site at http://www.ecy.wa.gov/programs/spills/preparedness/prc/prc.htm.

CHAPTER 2

Writing the Plan

This chapter guides you through a step-by-step plan development process. Topics addressed include:

I. Plan formatting
II. Introduction and plan content
III. Emergency response actions
IV. Training and exercises
V. Review and update procedures
VI. Appendices

I. Plan formatting

Keep the following rules in mind as you write and organize your plan:

- Write the plan so it will be easy to use in the event of a spill response.
- Organize the plan in the order specified in 33 CFR Part 154.1030, and outlined in this guide.
- Include easy to find markers or tabs that identify each section. Use cross references to show where you meet the federal and state requirements in the plan.

II. Introduction and plan content

This section should be the first section in your plan, and should include:

- A table of contents.
- A record changes page.
- The facility's name, address, city, county, state, ZIP code, telephone number, and FAX number.
- The name, address and 24-hour contact information for the facility owner or operator.

Note: Include a mailing address if it is different from the street address.

For example

Name of facility: Todd's Oil Company
Street Address: 1234 Wild Road, Olympia, WA 98506
Mailing Address: PO Box 8888, Olympia, WA 98506
County: Thurston
Telephone: (360) 123-4567
Fax: (360) 999-8888

Facility owner information
Name: Todd Johnson
Address: 1234 Wild Road, Olympia, WA 98506
Telephone: (360) 123-4567
Pager: (360) 999-7777

III. Emergency response actions

This section of your plan must include the following subsections 1 to 5:

1. Notification procedures

List the persons or organizations you must notify in the event of an oil spill from your facility. At a minimum, the list should include:

- Facility response personnel identified in the response plan.
- Primary Response Contractor.
- Qualified individual and alternative.
- Federal, state, or local agencies, as required.

This section must indicate the legal requirement to notify the National Response Center and Washington State Emergency Management Department, and contain a statement that it is not necessary to wait until all information is available before making initial notifications.

Tip: When training your staff on making notifications, you should stress the order of notifications and the legal requirement to make the calls to NRC and WA State EMD. Failure to do so may result in penalties.

Sample notification form		
Qualified Individual	Phone #	Pager#
Todd Johnson		
Alternate Qualified Individual		
Sam Johnson		
Facility Response Personnel		
Name (List all applicable personnel)	(Phone/Pager#)	(Role)
Oil Spill Removal Organization:		
Clean It Up Company	Phone 1-800-BIG-SPIL	
Federal, State, and Local Agencies		
Fire Dept	911	
National Response Center	1-800-424-8802	
Washington State Emergency Management	1-800-258-5990	
(Others as appropriate)		

Note: Others as appropriate may include the local Coast Guard office, the Department of Ecology, and the Local Department of Emergency Management Office. These calls should not be made until after the required calls are completed.

Discharge Form: The plan should contain a form that will be used to collect the information the response agencies will request during initial and follow-up notifications. See sample on next page.

Reporting party Name: Phone: Company: Position: Address: City, State, Zip	Suspected party Name: Phone: Company: Organization type: (private, public etc.) Address: City, State, Zip
It is not necessary to wait for all information before calling the National Response Center 1-800~424-8802 and WA State EMD 1-800-258-5990	
Were materials discharge? Yes / No	Calling for responsible party? Yes / No
Incident description Source and/or cause of incident: Date and time: Incident address/location: Distance form city:	 Nearest city:
Storage tank container:	Above ground? Yes / No Below ground? Yes / No
Facility capacity Tank capacity: Mile post or river mile:	 Latitude degrees: Longitude degrees:
Materials Discharge unit or quantity: Discharge material:	 Measure: Quantity in water:
Response actions Actions taken to correct or mitigate incident:	
Impact Number of injuries: Evacuation necessary? Yes / No Damage?	 Number of fatalities: Number evacuated:
Additional information (any information about the incident not recorded elsewhere in the report)	
Caller notification Fire NRC WA State EMD	 USCG Ecology Other

2. Spill mitigation procedures

This section should identify the following potential spill volumes for each group of oil handled by the facility:

- Average most probable discharge.
- Maximum most probable discharge.
- Worst case discharge.

Sample

Todd's Oil Company operates one tank truck with a total oil capacity of 5,000 gallons. Discharge calculations are based on this figure. The company transfers diesel exclusively, so the oil group type is non-persistent.

Discharge type: Non-persistent oil group

Average most probable 50 gallons (1% of worst case)

Maximum most probable 500 gallons (10% of worst case)

Worst case 5,000 gallons

These numbers are used when designing spill scenarios from your facility.

In addition, this section should include procedures that your facility personnel will follow to mitigate or prevent a discharge of oil involving the following scenarios:

- Hose failure;
- Tank overfill;
- Tank failure;
- Explosion or fire; and
- Equipment failure (pumping system failure, relief valve failure, etc.)

Include in this section a list of response equipment owned and available to the company and describe the responsibilities of the facility personnel when responding to an average most probable discharge.

Sample spill mitigation and prevention procedures

Hose failure

1. Stop the transfer operation.
2. Disconnect and remove the hose (if safe).
3. Notify coworker and ship personnel.
4. Notify Todd's Oil dispatch; dispatch will notify response contractor, NRC, WEMD, etc.
5. Place absorbent pads on and around the spill.
6. If feasible, use a vacuum truck to collect spilled product.

Tank overfill

1. Stop the transfer operation.
2. Notify coworker and ship personnel.
3. Notify Todd's Oil dispatch; dispatch will notify response contractor, NRC, WEMD, etc.
4. Place absorbent pads on and around the spill.
5. If feasible, use a vacuum truck to collect spilled product.

Tank failure

1. Stop the transfer operation.
2. Stop the flow (if possible).
3. Notify coworker and ship personnel.
4. Notify Toad's Oil dispatch; dispatch will notify response contractor, NRC, WEMD, etc.
5. Place absorbent pads on and around the spill.
6. Place boom around tank/spill area.
7. If feasible, use a vacuum truck to collect spilled product.

Explosion or fire

1. Stop the transfer operation.
2. Notify coworker and ship personnel.
3. Notify the fire department.
4. Notify Todd's Oil dispatch.
5. Attempt fire fighting with extinguishers if safe.
6. Place absorbent pads on and around the spill.

Equipment failure

1. Stop the transfer operation.
2. Notify coworker and ship personnel.
3. Notify Todd's Oil dispatch.
4. Place absorbent pads on and around the spill.

3. Response activities

This section of your plan should include the following information:

- The responsibilities of facility personnel to initiate and supervise a response pending the arrival of the qualified individual.
- The responsibilities and authorities of the qualified individual and the alternate qualified individual.
- The identity and capabilities of response contractors to respond to a worst case discharge.

Tip: Use Appendix C to 33 CFR Part 154 to identify and evaluate required response resources for facility response plans.

Sample response activities
Facility personnel responsibilities
1. Stop the transfer
2. Notify coworker and ship personnel
3. Notify Todd's Oil dispatch; dispatch will notify NRC, WEMD, etc.
4. Place absorbent pads over and around the spill.
Qualified individual and alternative responsibilities
1. Activate and contract with oil spill removal organizations
2. Act as liaison with the Federal and/or State On-Scene Coordinator
3. Obligate funds required to carry out response activities
Oil Spill Removal Organization/Primary Response Contractor
1. Clean It Up Company is Todd Oil Company's primary oil spill removal organization. The 24-hour phone number for Clean It Up is 1-800 BIG SPIL. Clean It Up has the resources and personnel to respond to the following Todd Oil
2. Company spill scenarios:
3. Average most probable discharge (50 gallons)
4. Maximum most probable discharge (500 gallons)
5. Worst case discharge (5000 gallons)
Clean It Up Company does not have an oil spill removal organization classification from the Coast Guard. The equipment and personnel resources available to Todd's Oil Company through Clean It Up Company are listed in Appendix 3 of Todd's Oil Company's response plan.

4. Sensitive environments and guidance information

Include the following information about sensitive environments in your plan:

A list of all potentially affected sensitive environments. Prepare a separate list for each transfer location.

- A description of response actions to protect sensitive environments.
- A map or chart showing the location of all applicable sensitive environments.
- A list of response equipment and personnel available by contract or other approved means to protect sensitive environments.

Where can I find resources to meet this requirement?
The Northwest Area Contingency Plan (NWAC): The NWACP contains state and federal policies, guidelines, and checklists that directly relate to oil spill responses in Washington State. The NWACP can be found on line at http://rrt10nwac.com/

The NWACP contains GRPs that provide detailed information that is useful in responding to environmentally sensitive areas, climatic and geographic information. GRPs are available on line at the ecology preparedness website.http://www.ecy.wa.gov/programs/spills/preparedness/preparednesstable.htm

A list of oil spill response equipment located in specific geographic areas can be located on a data base hosted by Genwest Systems, Inc. http://www.wrrl.us/index.html.

5. Disposal plan

Describe disposal procedures for recovered oil and oil contaminated debris in this subsection.

Tip: A sample disposal plan can be found in the NWACP, Section 9620.

IV. Training and Exercises

Include in this section a statement that the facility will participate in unannounced drills as described in WAC173-180 part H and required in WAC 173-180-730.

This section should be used to describe how your facility meets the training and exercise program requirements of 33 CFR Parts 154.1050 and 154.1055 as well as the drill requirements in WAC 173-180-810. Chapter 3 addresses training and exercise program requirements.

V. Plan review and update procedures

This section should describe the procedures that you will use to review and update your plan. Chapter 3, section F addresses plan review in detail.

Tip: Ecology may review and request changes to your response plan following any oil spill, inspection, or drill.

The review and update procedures should reflect the requirement to keep the plan up-to-date and accurate with a formal internal review annually. As there are many copies of the plan, the procedures should detail how the facility will manage oversight and tracking of changes. WAC 173-180-760 requires the facility to submit two paper copies and one electronic of the changed sections to Ecology.

In addition to the facility's internal reviews, Ecology reviews the facility's oil transfer response plan every five years. This section should describe the procedures the facility will use to ensure at least **ninety calendar days in advance of the expiration date of the response plan**, two paper copies and one electronic copy of the response plan is submitted for re-approval or a letter is sent requesting review of the response plan currently on file.

Note: You must keep the response plan at each transfer location as well as the primary place of business (reference WAC 173-180-770).

VI. Appendices

Include the following appendices in your plan:

1. Appendix 1, Facility specific information

This appendix must contain a description of the facility's principal characteristics, including:

- A physical description of the facility including a plan of the facility showing the mooring areas, transfer locations, control stations, locations of safety equipment, and the location and capacities of all piping and storage tanks, as applicable
- A list of the sizes, types, and number of vessels that the facility can transfer oil to or from simultaneously
- A list containing information on the oil handled in bulk. Product information must include:
- Generic or chemical name
- Appearance and odor
- Physical and chemical characteristics
- Handling hazards
- Fire fighting procedures

Note: Include a diagram of your mobile transfer facility and a basic description of a typical mooring area in this section.

Tip: You can use a material safety data sheet (MSDS) that meets Occupational Safety and Health Administration (OSHA) regulations in 29 CFR Part 1910.120 or equivalent to fulfill this requirement. If you have MSDS's in your facility operations manual, you can simply reference the applicable operations manual section in this appendix.

2. Appendix 2, List of contacts

List 24-hour contact information for key individuals and organizations, including:

- The primary and alternative qualified individual.
- Primary Response Contractor.
- The appropriate federal, state, and local officials.

3. Appendix 3, Equipment lists and records

Include a list of equipment and facility personnel required to respond to an average most probable discharge in this appendix.

List all of the major equipment identified in your plan that belongs to a contractor that is available, by contract or other approved means, to respond to a maximum most probable or worst case discharge. Include the following information for each piece of equipment:

- The type, make, model, and year of manufacture listed on the nameplate of the equipment.
- The effective daily recovery rate for oil recovery devices
- The overall height and type of end connectors for containment boom
- The applicable spill scenario (worst case discharge, maximum most probable discharge, or average most probable discharge)

Note: Make sure you list the location of this equipment.

- The total daily capacity for storage and disposal of recovered oil
- The primary and secondary radio frequencies for communications equipment
- The location
- The date of last inspection

Tip: It may not be necessary to repeat all of this information in your plan if it exists elsewhere. You can refer to the regional list of equipment to meet this requirement. You can include this equipment information in a separate document as long as the appendix references that document. If your oil spill removal organization is classified by the Coast Guard and its capacity equals or exceeds the response capability needed by your facility, it is not necessary to list the organization's response equipment in the appendix. In this case, simply note the appropriate Coast Guard classification.

4. Appendix 4, Communications plan

Describe the primary and alternate methods of communication during oil spills. Your communications plan should address all transfer locations identified in the response plan.

Tip: You may refer to communication equipment provided by your oil spill removal organization in the communications plan. This appendix may reference an existing communications plan.

5. Appendix 5, Site-specific safety and health plan

Describe the safety and health plan that you will implement for any response location. Provide as much detail as is practicable in advance of an actual oil spill.

Tip: You may reference an existing site safety plan prepared to meet OSHA requirements.

6. Appendix 6, List of acronyms and definitions

List and define acronyms used in your response plan that are unique to your company or that are commonly used by response agencies. Include any definitions that are critical to understanding your response plan.

CHAPTER 3

Maintaining the plan

Just because you finished writing your plan doesn't mean that the response planning process is complete. A response plan is a living document and needs proper care and maintenance. Properly maintaining your plan will enhance your preparedness to respond to an oil spill and will ensure future compliance with the regulations. This chapter discusses key plan maintenance tasks and highlights common problem areas for plan holders. Topics addressed include:

I. Response information required during transfers
II. Training program
III. Exercise programs
IV. State unannounced drills
V. Inspection and maintenance of response resources
VI. Plan submission, approval, review, and revision procedures

I. Response information required during transfers

Mobile facility operators must carry certain response plan-related information with them during transfer operations. Required information includes:

- A description of the response activities for a discharge which may occur during transfer operations, checklists work well for this
- A list of response resources available to respond to a discharge from the facility
- A contact list for persons and agencies that must be advised of an oil spill from the facility, including the National Response Center and Washington State Emergency Management.

You should retain the above information at your principal place of business as well.

II. Training program

A response plan must describe the training requirements of WAC 173-180-810 and 33 CFR 154.1050. A facility owner of a mobile facility must identify the training to be provided to each individual with responsibilities under the plan. A facility owner or operator must identify the method to be used for training any volunteers or casual laborers during a response to comply with the requirements of 29 CFR 1910.120. In addition:

- A facility owner or operator shall ensure the maintenance of records sufficient to document training of facility personnel; and shall make them available for inspection upon request by Ecology. Records for facility personnel must be maintained at the facility for 3 years.

- Where applicable, a facility owner or operator shall ensure that a Primary Response Contractor identified in the response plan to meet the requirements of this subpart maintains records which are sufficient to document training for the organization's personnel and they are available for inspection upon request by the facility's management personnel, the QI and Ecology. Records must be maintained 3 years following competition of training.
- The facility owner or operator remains responsible for ensuring that all private response personnel are trained to meet the OSHA standards for emergency response operations in 29 CFR 1910.120.

III. Exercise Program

Your response plan must describe your company's pollution response exercise program or drill program. Ecology will attend and evaluate deployment drills that test your ability to use the response equipment and your emergency shutdown procedures. Under the federal requirements, exercise programs include the following exercise types and frequencies:

- Quarterly qualified individual notification exercises
- Annual spill management team tabletop exercises
- Semiannual facility-owned equipment deployment exercises
- Annual oil spill removal organization-owned equipment deployment exercises

Note: Annually, at least one of the exercises listed above must be unannounced. Unannounced means that the people participating in the exercise are not advised in advance of the exact date, time, and scenario of the exercise.

In the Northwest, drills are schedule in advance on the Area Exercise Schedule. (http://rrt10nwac.com/files/schedule/drill_schedule.html). We will assist you in tracking and meeting the requirements of these drills. A separate drill guidance manual for mobile facilities has been prepared. It is available at (www.ecy.wa.gov/programs/spills/spills.html).

IV. State Unannounced Drills

The state may use unannounced drills to test your response capabilities. The plan must include a statement that the facility will participate in unannounced drills as described in part H of WAC 173-180. Ecology may conduct the following types of unannounced drills (WAC 173-180-810):

- Deployment drills that may involve testing whether or not the facility can deploy personnel, boom, recovery, and storage equipment as described in WAC 173-180-215.
- Notification and emergency shutdown procedure drills. These drills involve testing the facility's ability to follow the notification in the response plan and emergency shutdown procedures described in the operations manual.

Ecology will evaluate these drills. At the start of the unannounced drill, Ecology will notify you of the drill objectives, expectations and scenario.

You may request to be excused from an unannounced deployment drill if conducting the drill poses:

- An unreasonable safety or environmental risk or,
- Significant economic hardship.

We will provide you with a drill evaluation. If significant deficiencies are found during the drill, you may be required to re-drill once the problems are corrected.

V. Inspection and maintenance of response resources

You must ensure that all major facility-owned response equipment, including containment booms, skimmers, and work boats, is periodically inspected and maintained in good operating condition in accordance with manufacturer recommendations and best commercial practices.

Note: You are not required to inspect, maintain or document the maintenance of equipment owned and operated by your Primary Response Contractor.

For all facility-owned response equipment, Ecology may:

- Verify that the equipment inventories exist as represented
- Verify the existence of maintenance records
- Verify that the maintenance records reflect the actual condition of the equipment
- Inspect and require operational tests of the equipment

Make sure that you document all equipment inspection and maintenance. The documentation does not need to be in your response plan; however, it should be readily available for inspection at all times. Maintain these records for at least 3 years.

VI. Plan review and revision

1. Response Plan Submission Requirements

You must prepare and submit a response plan to the Department of Ecology if you own or operate a mobile facility and transfer oil to a non-recreational vessel regardless of size.

Two paper copies and one electronic copy of the response plan must be delivered to:

The Department of Ecology
Spill Prevention, Preparedness, and Response Program
Response Plan Review
P.O. Box 47600
Olympia, WA 98504-7600

OR

300 Desmond Drive
Lacey, WA 98503

2. Response Plan Review and Approval

Once we receive your plan, we will review it and contact you if:

- The response plan has been approved. You will receive a letter indicating approval and will include an expiration date for the response plan.
- Deficiencies are found in the response plan. If deficiencies are found, we will grant you conditional approval and help you understand what needs to be done to complete the plan.

Note: If you add new transfer locations to your operating area, you must update your response plan and submit the updates to the Department of Ecology before conducting transfers at these locations.

In between the five years for plan approval, you must review your plan annually within 1 month of the anniversary date of submission of the plan to the Department of Ecology.

You must submit any revisions you make to your plan to the Department of Ecology and all other plan holders. Along with the revisions, you should submit a cover letter listing all of the revisions to the plan. Note all plan revisions on your plan's record of changes page.

If, after conducting an annual review, you determine that no revisions are necessary, simply indicate the completion of the annual review on your plan's record of changes page and send a letter to us indicating there are no changes.

You must submit revisions to your response plan when any of the following scenarios occur:

- Changes in the facility's configuration that significantly affect response plan information
- Changes in the type of oil handled by the facility that affect required response resources
- Changes in the name or capabilities of your oil spill removal organization
- Changes in the facility's emergency response procedures
- Changes in the facility's operating area
- Other changes that significantly affect implementation of the plan.