



# **ADEC Response Exercise Program Improvements Process Vision Session Results Report**

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Prepared for

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Attachment A Spreadsheet - *170102 ADEC DEXP Vision Session Results w Themes*

## ABBREVIATIONS

ADEC	Alaska Department of Environmental Conservation
EPA	Environmental Protection Agency
HSEEP	Homeland Security Exercise and Evaluation Program
IAP	Incident Action Plan
ICS	Incident Command System
IMT	Incident Management Team
LNO	Liaison Officer
JIC	Joint Information Center
MAD	Mutual Aid Drill
NIMS	National Incident Management System
NPREP/PREP	National Preparedness for Response Exercise Program
NRDA	Natural Resources Damage Assessment
OSRO	Oil Spill Removal Organization
OPS	Operations Section
PIO	Public Information Officer
PRAC	Primary Response Action Contractor
PMI	Project Management Institute
RRT	Regional Response Team
RP	Responsible Party

## 1.0 Visioning Session Purpose and Overview

The Alaska Department of Environmental Conservation (ADEC) is working on improvements to its Response Exercise Program. The goal of the effort is to improve the program to better serve the needs of regulators, regulated operators, spill response organizations, and other stakeholders, while maintaining or improving the state of oil spill response readiness within the State of Alaska. This is an interim report of the larger effort to make improvements to the Response Exercise Program. A final report will be issued after program decisions have been made and vetted in a public workshop to be held in April.

In accordance with the Stakeholder Involvement Work Plan submitted to the ADEC in October 2016, Nuka Research and Planning Group, LLC (Nuka Research) conducted a Visioning Session in December 2016. The Visioning Session explored the conceptual needs identified in feedback on ADEC's draft white paper<sup>1</sup>, including clarification of response exercise roles and responsibilities and exploration of basic tenets forming the foundation of the Response Exercise Program. The Visioning Session content was further informed by the results of the preceding online survey conducted from November 2 to November 22.<sup>2</sup>

The purpose of the session was to brainstorm and garner ideas and opinions on issues associated with ADEC's Response Exercise Program. It was not intended for voting or ranking those ideas and opinions. Participants were encouraged to offer unique and innovative perspectives on the topics discussed vs. agreeing or disagreeing with something that had already been said. The intent was to understand the breadth of opinions, not the popularity of them.

## 2.0 Session Methodology

The Visioning Session was conducted on the 8<sup>th</sup> and 13<sup>th</sup> of December 2016 utilizing a teleconference and an online collaborative tool to solicit further information on issues raised in the survey. For survey statements where there was near universal agreement, no follow up questions were deemed necessary. For survey statements where there was significant disagreement or lack of consensus among different groups of respondents, follow up questions for the visioning session were created to obtain more information.

The survey statements and visioning session prompts were grouped in categories that could allow them to be viewed in a more systematic manner. Survey questions were grouped into the following categories:

- Program Management
- Exercise Design, Development, and Conduct
- Exercise Evaluation/Improvement Planning

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<sup>1</sup> February 1, 2016. Alaska Department of Environmental. Response Exercise Improvements - Draft White Paper. <https://dec.alaska.gov/spar/ppr/docs/ResponseExerciseProgramImprovementsDRAFT.pdf>

<sup>2</sup> December 2016. Nuka Research and Planning Group and ASRC Energy Services. ADEC Response Exercise Program Improvements Process Survey Results Report DRAFT. <http://dec.alaska.gov/spar/ppr/docs/Survey-Results-Report.pdf>

Participants were able to hear instructions and prompts for comments from a facilitator over the teleconference and then enter their comments on the prompts through the online tool. Participants were asked to identify themselves as belonging to one of the following five stakeholder groups, but otherwise their comments were anonymous:

- Crude Oil Facilities
- Refined Product Facilities
- Primary Response Action Contractors (PRACs)
- State and Federal Agencies
- Other Drill and Exercise Stakeholders

The session began with a review of the results of the online survey and then moved into the prompt and comment phase of the session.

Prompts took the form of either a question or a statement with a fill-in the blank. Most prompts were associated with a statement used in the online survey, and those statements were displayed along with the prompt. Table 1 provides prompts used in the visioning session and the associated survey statements, where applicable.

Because some respondents in the survey indicated a lack of familiarity with the Homeland Security Exercise and Evaluation Program (HSEEP), a brief overview of HSEEP was provided to the visioning session participants to better inform their responses.

**Table 1. Prompts used to solicit comments in the visioning sessions and associated survey statements.**

	Survey Statement	Visioning Session Prompt
Program Management	The ADEC Response Exercise Program helps improve my organization's ability to respond to an oil spill.	A. How does the current ADEC Response Exercise program help your organization improve its ability to respond to an oil spill?
		i. What do we keep?
		ii. What do we change?
	ADEC should develop a guidance document to assist operators in understanding the purpose, expectations, and requirements of the ADEC Response Exercise Program.	iii. What do we eliminate?
		B. What elements should be included in a guidance document to the ADEC Response Exercise Program and why?
		C. Is National Preparedness for Response Exercise Program (NPREP) sufficient for the State of Alaska to determine if a state approved Oil Discharge Prevention and Contingency plan is adequate in content and execution? Why or Why not?
	D. Can some state and federal exercise requirements be more efficiently combined?	

	Survey Statement	Visioning Session Prompt
Exercise Design, Development, and Conduct	Please rate your familiarity with Homeland Security Exercise Evaluation Program (HSEEP).	E. After seeing the HSEEP presentation, which components of HSEEP would be useful for ADEC to adopt?
	The role of ADEC staff during exercises is clear and is helpful to our exercise experience.	F. How can ADEC staff make their role during exercises more clear?
		G. How can ADEC staff be more helpful during exercises?
	Participation in response exercises represents a good value (in terms of time and money) for my organization.	H. What does “value” in a response exercise mean to you?
		I. What can be done to improve the value of exercises?
	Many of the drills and exercises that I have attended are too scripted and practiced to be useful for assessing preparedness.	J. What can be done to make exercises less scripted?
K. How do we make exercises more realistic?		
Exercise Design, Development, and Conduct	Unannounced exercises are useful for testing response readiness and should be utilized more often.	L. If you disagree with this statement, why?
	A multi-year exercise scheduling tool should be used to plan exercises.	M. If you disagree with this statement, why?
	A program should be developed to exercise Primary Response Action Contractors (PRACs), separately from Regulated Operators, for implementing response tactics. This would reduce the redundancy inherent in the current system.	N. How can PRAC’s be exercised to the benefit of multiple plan holders?
		O. What would be the disadvantages of such a program?
	In my experience, some exercise objectives are over exercised and some are not exercised enough.	P. Which exercise objectives are overused? Why?
		Q. Which exercise objectives are underused? Why?
	A risk-based approach should be used to determine exercise requirements.	R. If you disagree with this statement, why?
S. What risk factors should be used to determine exercise requirements?		

	Survey Statement	Visioning Session Prompt
Exercise Evaluation, Outcomes, and Improvement Planning	An easily accessible statewide anonymous database of exercise lessons learned would be a useful tool.	T. If I had access to the lessons learned in other organizations exercises, I would use that information to _____.
		U. A lessons learned database would not be useful because _____.
	No Survey Statement	V. ADEC has been asked to provide Operators with credits for conducting exercises.
		i. How would a credit mechanism be beneficial to you?
		ii. What would a program like this look like?
	W. Please list any additional topics (not covered in this session) that you feel are important for ADEC to consider as they make modifications to the Response Exercise Program.	

Comments received in the visioning sessions were input into spreadsheets - one for each prompt. Themes were associated with comments in order to sort by stakeholder group and themes.

### 3.0 Description of Participants

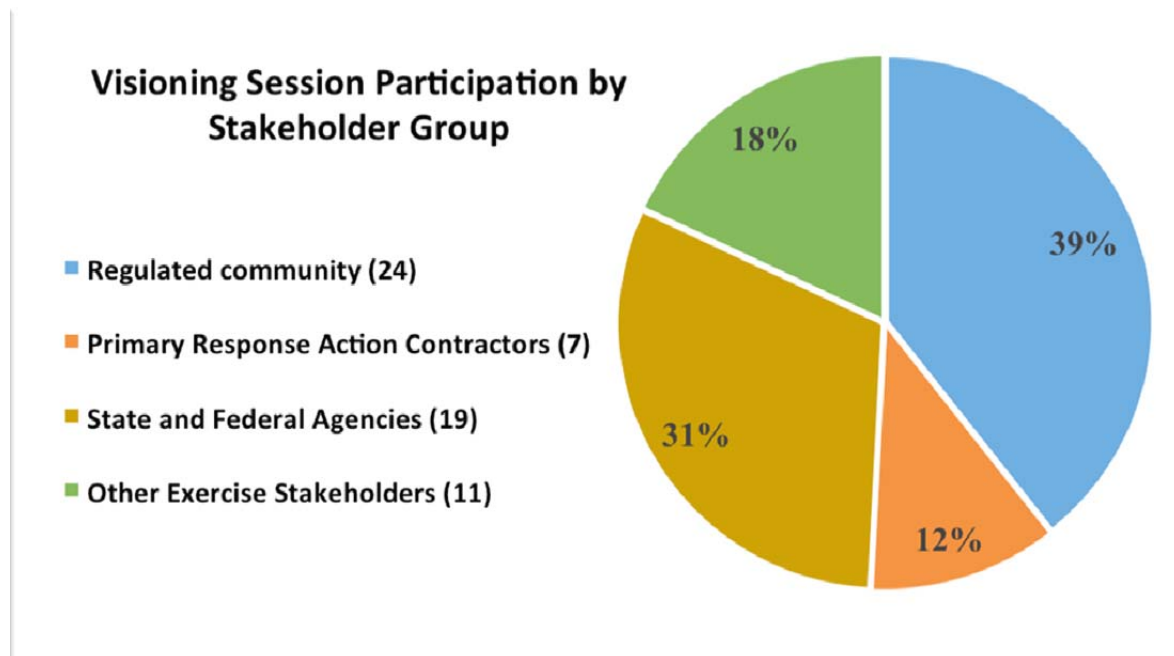
A total of 97 invitations were sent to participants in the online survey and other interested parties. Since participation was anonymous, it is not possible to know who commented; however 61 callers participated in at least one of the two sessions. Table 2 provides a tally of the organizations and the number of participants that attended at least one of the two sessions. Figure 1 contains the number and percentage of participants by stakeholder group that attended at least one of the two sessions.

**Table 2. Number of individuals by organization that attended at least one of the visioning sessions.**

Organization	Number of Attendees
ADEC	15
Alyeska Pipeline Service Company	5
ConocoPhillips	3
Prince William Sound Regional Citizens' Advisory Council (RCAC)	3
Alaska Chadux Corporation	2
Alaska Clean Seas	2
Alaska Tanker Company, LLC	2
Delta Western, Inc.	2
Polar Tankers/ConocoPhillips	2
SLR International Corporation	2
The Response Group	2
Alaska Department of Fish and Game	1
Alaska Department of Natural Resources	1

Organization	Number of Attendees
Alaska Steamship Response	1
Armstrong Energy, LLC	1
British Petroleum Exploration (Alaska)	1
Caelus Energy Alaska	1
Cook Inlet Spill Prevention and Response Inc. (CISPRI)	1
Cook Inlet Regional Citizens Advisory Council	1
Crowley Fuels	1
U.S. Environmental Protection Agency (EPA)	1
Glacier Oil & Gas Corp.	1
Hilcorp Alaska, LLC/Harvest Alaska, LLC	1
Kanaga Environmental Consulting	1
Matanuska Electric Association	1
North American Fuel Corporation	1
Pearson Consulting LLC	1
Petro Star, Inc.	1
Power Systems & Supplies of Alaska	1
Trident Seafoods	1
U.S. Coast Guard	1
Vitus Energy	1
<b>Total</b>	<b>61</b>

**Figure 1. Number and percentage by stakeholder group of the 61 participants that attended at least one of the visioning sessions.**





## 4.0 Results

There were 2,090 comments received during the two sessions. The comments are contained in a spreadsheet as Attachment A. The Microsoft Excel file located on ADEC’s Response Exercise Program website titled “170102 Attachment A ADEC DEXP Vision Session Results w Themes” contains the comments in a sortable form by order received, stakeholder group, or theme. The spreadsheet is intended to allow further exploration of the comments received through queries and sorting.

Table 3 is an excerpt from Attachment A. The prompt is listed at the top of the spreadsheet. Responses to the prompt are in bold and preceded by a bullet character (•). Comments by respondents to that particular response are in plain text and preceded by a dash (-). Comments are sequentially numbered in the order they were entered into the online collaboration tool. Those numbers are preceded by a “#” followed by the respondent’s stakeholder group. That stakeholder group is also broken out in the “Group” column so that responses can be sorted by stakeholder group. The “Order” column was added to allow comments to be resorted back to their original order. In the example below, response #40 was provided by a member of the PRAC stakeholder group. Response #97 was a response to comment #40 by a member of the Crude Oil Facilities group that took some time to develop and enter. The Order column allows these comments to remain linked together after they are sorted. The spreadsheet can also be sorted by a Theme column, which has been left out of this excerpt for formatting purposes.

**Table 3. Excerpt from Attachment A.**

Order	Group	A. How does the current ADEC Response Exercise program help your organization improve its ability to respond do an oil spill?
18	Primary Response Action Contractors	• <b>The current program works well enough. Less than perfect but good enough. (#40   Primary Response Action Contractors)</b>
19	Crude Oil Facilities	- The current process is very confusing. (#97   Crude Oil Facilities)

## 5.0 Summary of Results

This section briefly summarizes the comments received for each prompt, organized by category. The themes listed below were identified by the visioning session facilitator based on the variety of comments received. Similar comments were lumped into themes. These themes and categories are intended for high-level review/summarization of the comments and are not intended to be substitute for the comments themselves.

### 5.1 Program Management

**Prompt A. How does the current ADEC Response Exercise program help your organization improve its ability to respond do an oil spill?**

**Cooperation/Communication:**

- Develop partnerships and relationships.
- Build trust, team building
- Practice training opportunities, understand roles and requirements.

- Understand participant’s roles, responsibilities, and limits.
- Involve stakeholders.
- Share teaching moments.
- Need face to face time with industry experts, regulators, and partners

**Role of ADEC:**

- Evaluate adequacy of responses.
- Provide timely and reliable feedback from which a company can benefit.
- Continue to observe but provide better evaluations.
- Participate in a planned fashion with each participant having a deliverable to help the Incident Management Team (IMT).
- Needs to provide clear direction regarding testing of State’s Master Plan, roles are unclear
- Provide publicly available guidance for exercise design.

**What do we keep?**

- Joint planning of exercises, relationships with plan reviewers
- NGO Participation
- Inter-agency and governmental cooperation
- In person participation of drills and exercises
  - ADEC needs to receive state funded travel dollars.
- Provide senior, experienced state personnel to provide training, evaluation or participation in the exercise.
- Exercises:
  - Standard evaluation criteria
  - Focus on learning versus Pass/Fail.
  - More realistic
  - Longer duration
  - Un-announced and spontaneous

**What do we change?**

- Include Alaska Native governments.
- Share documents.
- Allow for all participants in Mutual Aid drills (MAD) to have their participation recognized.
- Establish joint exercise planning.
- Adapt PREP and HSEEP to Alaska.
- Improve guidance documents (planning, objectives, lessons learned).
- Improve scheduling.
- Written evaluation of exercises
- More coordination between Federal/State/local agencies on planning drills
- Share lessons learned.

- Evaluation standards for the exercises process to improve consistency and objectivity.
- Establish clear goals and objectives for training exercises.
- Establish more realistic drills and exercises.
- Adopt project management principles according to the Project Management Institute (PMI) guide.

### **What do we eliminate?**

- Focus on “Gotcha”.
- Unannounced Drills
- Repeated/redundancy of exercises
- Reduce/eliminate drills during extreme weather conditions.
- Shorten duration of drills/exercises.
- Mandate all involved parties to be present from beginning until end of exercises/training.
- Ability to modify exercises at last minute
- Temper the expectation of a completed Incident Action Plan (IAP) in one day.
- Lack of follow through from past drills/exercises; need to share lessons learned
- Adjust single day drills: too scripted, unrealistic, does not test what needs to be tested.

### **Prompt B. What elements should be included in a guidance document to the ADEC Response Exercise Program and why?**

- Clear goals and expectations; expected deliverables
- Joint planning with all players
- Clear roles and responsibilities
- Why state requirements are different than federal/other requirements
- Competency requirements for ADEC personnel involved in exercises
- Adopt NPREP to demonstrate unified cooperation amongst regulators.
- Capture, collaborate, and share on lessons learned.
- NPREP/HSEEP
- National Incident Management System (NIMS)/Incident Command System (ICS)
- Credits
- Process for developing an exercise schedule
- Allowance for schedule modifications due to extreme weather conditions

### **Prompt C. Is NPREP sufficient for the State of Alaska to determine if a state approved Oil Discharge Prevention and Contingency plan is adequate in content and execution? Why or Why not?**

Many comments conflicted with each other

#### **Comments supporting NPREP sufficiency (Yes):**

- Comprehensive

- Acceptance in other jurisdictions
- Provides clear guidance
- Definite schedule to follow (easy to understand)
- Provides consistency
- Scalable

**Comments not in support of NPREP’s sufficiency (No):**

- NPREP lacks level of adequate exercises.
- Too simple
- NPREP is too difficult to understand.
- Does not meet State requirements
- State of Alaska requirements are more detailed and expect stronger response capabilities.

**Prompt D. Can some state and federal exercise requirements be more efficiently combined?**

- Too many redundancies
- Combine field visits and inspections.
- Conduct joint combined exercises.
- Need stable point of contact for drills and exercises
- Provide both federal and state credit for exercise objectives.
- Coordinate objectives for exercises.
- Use the Alaska Regional Response Team (RRT) for coordination.
- Design exercise evaluation criteria for state specific requirements that go beyond the federal requirements.
- Reduce business interruption and costs.

## **5.2 Exercise Design, Development, and Conduct**

**Prompt E. After seeing the HSEEP presentation, which components of HSEEP would be useful for ADEC to adopt?**

- Use of HSEEP exercise cycle
- Implement objectives based methodologies.
- Need more information
- Collaboration, planning, process, evaluation
- Multi-year calendar approach
- Elements of HSEEP need to be scalable.
- Dovetail NPREP and HSEEP.
- ADEC should provide HSEEP workshops.

**Prompt F. How can ADEC staff make their role during exercises more clear?**

- Take a stronger role in the exercise planning process. Roles, responsibilities and expectations for all participants should be made clear.
- Establish guidance/cooperation/collaboration with regulated community, sister agencies, federal partners.
- Provide guidance in roles and responsibilities.
- Provide an ADEC exercise guidance document specifying ADEC’s role during exercises.
- Don’t mix participation and evaluation roles.
- Need thorough pre-planning meetings.
- Establish and communicate expectations of outcomes.
- Cannot be an evaluator and player
- Better training for ADEC personnel as responders

**Prompt G. How can ADEC staff be more helpful during exercises?**

- Treat exercises as value added and lessons learned instead of like a test looking for violations.
- Define roles and responsibilities.
- Joint ownership in exercise process between ADEC and plan holders
- Understand the exercise plan and objectives.
- Insure ADEC responders have real world experiences.
- Coach instead of evaluate, participate not regulate
- Need better quality control of the state participation in truth and control to ensure consistent direction is provided from exercise to exercise
- Federal and state agencies should attain more knowledge for NPREP/exercise planning/ICS.
- Exercise planning teams should avoid last minute changes to the exercise planning process.

**Prompt H. What does “value” in a response exercise mean to you?**

- Develop knowledge and skills of responders.
- Establish same goals: insure everyone is working towards a common solution
- Identify areas for improvement and lessons learned.
- Continuous improvement
- Collaborate and build relationships.
- Provide training that has responders working through real life situations such as weather, broken equipment, and making adjustments to tactics as necessary.
- Practice so everyone learns and prepares
- Improve decision making.
- Verify/validate that contingency plans are adequate in content and execution.
- Train before exercises, exercises should test training.

**Prompt I. What can be done to improve the value of exercises?**

- Collaborate; more agency interaction
- Plan out exercises; more variety in drills (integrate lessons learned).
- Adopt HSEEP and then adapt accordingly
- Define roles and responsibilities
- Improve scheduling
- All participants should be players
- Improve follow-up and reporting
- Establish measurable quantities for success

**Prompt J. What can be done to make exercises less scripted?**

- Involvement/Collaboration with all stakeholders and community members
- Make scenarios/scripts plausible and realistic
- Allow adaptability when planned exercises are going in a different direction
- Use current real time weather/scenarios not in plan
- Provide responders a scenario and let them react based upon their real life experiences
- Identify areas or weaknesses; turn these into lessons learned
- Increase number of unannounced exercises and drills
- Increased active participation in exercises by agency personnel

**Prompt K. How do we make exercises more realistic?**

- Train for what actually happens; not just the worst that could happen
- Train during real weather conditions, real-time, tides
- Unannounced drills: evenings/nights/weekends
- More focus on most likely scenarios instead of worst case discharges
- Allow flexibility in exercises
- Avoid the “gotcha” moment
- Exercise activities rarely tested like longer term logistics and waste management

**Prompt L. Unannounced exercises are useful for testing response readiness and should be utilized more often. If you disagree with this statement, why?**

- Concern over impact on business operations
- Exercises and drills become activities for punishment rather than training to improve
- Limit frequency and usage
- Standardize them to focus on initial actions
- Insure these exercises don't threaten or hamper daily operations at a facility
- Unannounced drills do not test a company's ability to respond to a real incident

**Prompt M. A multi-year exercise scheduling tool should be used to plan exercises. If you disagree with this statement, why?**

There was very little disagreement on this topic

- Remove redundancies
- Do not stack exercises together
- Need for flexibility when planning over a year out to account for severe weather

**Prompt N. How can PRAC's be exercised to the benefit of multiple plan holders?**

- MAD is a great way to exercise PRACs
- Certain regions of state are underserved
- Skills associated with working with a PRAC also need to be exercised by all plan holders
- Establish roles, responsibilities, and objectives
- Share costs/finances
- Have more PRAC personnel at drills
- Don't require PRACs to exercise the same tactic for multiple plan holders
- Need for PRACs to understand every plan holders operations/site/plan

**Prompt O. A program should be developed to exercise Primary Response Action Contractors (PRACs), separately from Regulated Operators, for implementing response tactics. This would reduce the redundancy inherent in the current system. What would be the disadvantages of such a program?**

- Concern over costs and administrative burden
- Loss of levels of preparedness
- Places more burden on PRACs and less on Responsible Parties (RP)
- Lack of internal coordination
- Blurring of lines between PRAC and Oil Spill Removal Organization (OSRO) requirements
- Require a regulation or statute change
- Difficult to achieve consensus among PRAC members
- Loss of opportunities to collaborate between PRAC's and plan holders

**Prompt P. Which exercise objectives are overused? Why?**

- Worst case scenarios
- Boom deployment
- Public Information Officer (PIO), Liason Officer (LNO), Operations Section (OPS)
- IAP Completion

**Prompt Q. Which exercise objectives are underused? Why?**

- Local knowledge, involvement

- Wildlife
- Waste management
- Integration of agency personnel into the IMT
- Security, surveillance, tracking
- Exercising LNO and Joint Information Center (JIC)
- Logistics/legal
- Natural Resources Damage Assessment (NRDA)

**Prompt R. A risk-based approach should be used to determine exercise requirements. If you disagree with this statement, why?**

There was little disagreement for risk-based approaches

- Need to better understand this statement

**Prompt S. What risk factors should be used to determine exercise requirements?**

- Volume
- Product
- Sensitive areas
- Vessel traffic
- Navigation risk
- Toxicity
- Remoteness
- Number of responder's equipment
- Extreme weather
- Public land use
- Volume spilled
- Local land use/habitat

### 5.3 Exercise Evaluation, Outcomes, and Improvement Planning

**Prompt T. If I had access to the lessons learned in other organizations exercises, I would use that information to \_\_\_\_\_.**

- Compose training topics for my crews
- Identify trends
- Identify lessons learned that have not been encountered. Evaluate the probability of them occurring and design these into future exercises
- Improve training
- Strengthen exercise program
- Design exercises with objective not covered by others
- Share lessons learned



- Identify my facilities potential failings
- Review other’s solutions
- Demonstrate importance to legislators and government leaders

**Prompt U. A lessons learned database would not be useful because \_\_\_\_\_.**

Most comments stated that a lessons learned database would be useful

- Concerns over administration and cost
- Definition of a lesson learned is not always equal. They are specific to a company or area of operation
- Could be misused by those designing to advance a particular point of view or issue
- If it lacked a ‘search’ feature

**Prompt V. ADEC has been asked to provide Operators with credits for conducting exercises.**

**(i) How would an exercise credit mechanism be beneficial to you?**

- Discussion about ‘what’ is a credit, it’s function, etc. Examples include:
  - Protection from “over drilling” or conducting too many exercises
  - An actual response would offsets the need to conduct an exercise
  - Acknowledge that NPREP requirements were met for an ADEC exercises
- Provide confidence to next set of regulators
- Only if credit recognized good performance
- Only if credit recognized creativity, thinking out of the box

**(ii) What would an exercise credit program like this look like?**

- Several comments felt the credit should reflect verification of NPREP Performance
- Whatever program is developed should be applied consistently, using standard definitions and objectives for all entities
- Several respondents indicated that more information is necessary

**Prompt W. Please list any additional topics (not covered in this session) that you feel are important for ADEC to consider as they make modifications to the Response Exercise Program.**

- Using this online collaborative process (MeetingSphere) was very valuable:
  - Allowed for total collaboration
  - Anonymity allowed everyone to feel comfortable participating; very powerful feature.
  - Valuable process, time efficient
  - Fun
  - Eliminated the cost of travel and being face to face
- Insure ADEC’s staff trains in the actual operation of response equipment.

- Evaluate different parts of Alaska.
- Gain more experience with regards to NPREP, exercise design, goals, and objectives.
- Address 18AAC 75.485 in terms of providing better guidance to industry on the expectations and requirements of the exercise program.
- Some of the questions were not clear.
- ADEC should consider the expectations for a crude oil facility versus a small community terminal facility.
- Why is industry asking for NPREP adoptions?

## 6.0 Conclusion

The vision session provided a large quantity and a broad range of comments that will be helpful to ADEC as they plan improvement to their Response Exercise Program. Certain themes that recur across topic areas can be considered critical success factors or elements that are necessary to address to ensure the success of this program. Examples of critical success factors include:

- Addressing concerns over administrative and cost burdens.
- Designing exercises to promote a learning environment instead of becoming a “gotcha” event.
- Minimizing simulations during exercises.
- Increased awareness of:
  - Business operations by regulators.
  - State exercise requirements by industry.
- Use of standard planning processes, definitions and objectives.

The information gathered during this visioning session provided a wealth of information for ADEC to use while making programmatic decisions and producing a “straw man” plan to revise the Response Exercise Program. This draft plan will be presented to stakeholders in a workshop for the purpose of receiving feedback in April 2017. As this plan becomes more detailed, additional focus groups may be necessary to gather additional feedback.