

ANNEX D: PLAN REVIEW, UPDATE PROCEDURES, & SCHEDULE

APPENDIX I – REVISION AND UPDATE REQUIREMENTS

The Unified Plan will be reviewed periodically and revised as necessary by the EPA, US Coast Guard, ADEC, and the [Alaska Regional Response Team \(ARRT\)](#). Proposed changes should be submitted directly to the Coast Guard's District 17, EPA's Alaska Operations Office, or ADEC's Prevention, Preparedness, and Response Program office. The official text of the Unified Plan may be viewed at: <http://dec.alaska.gov/spar/ppr/plans/uc.htm>.

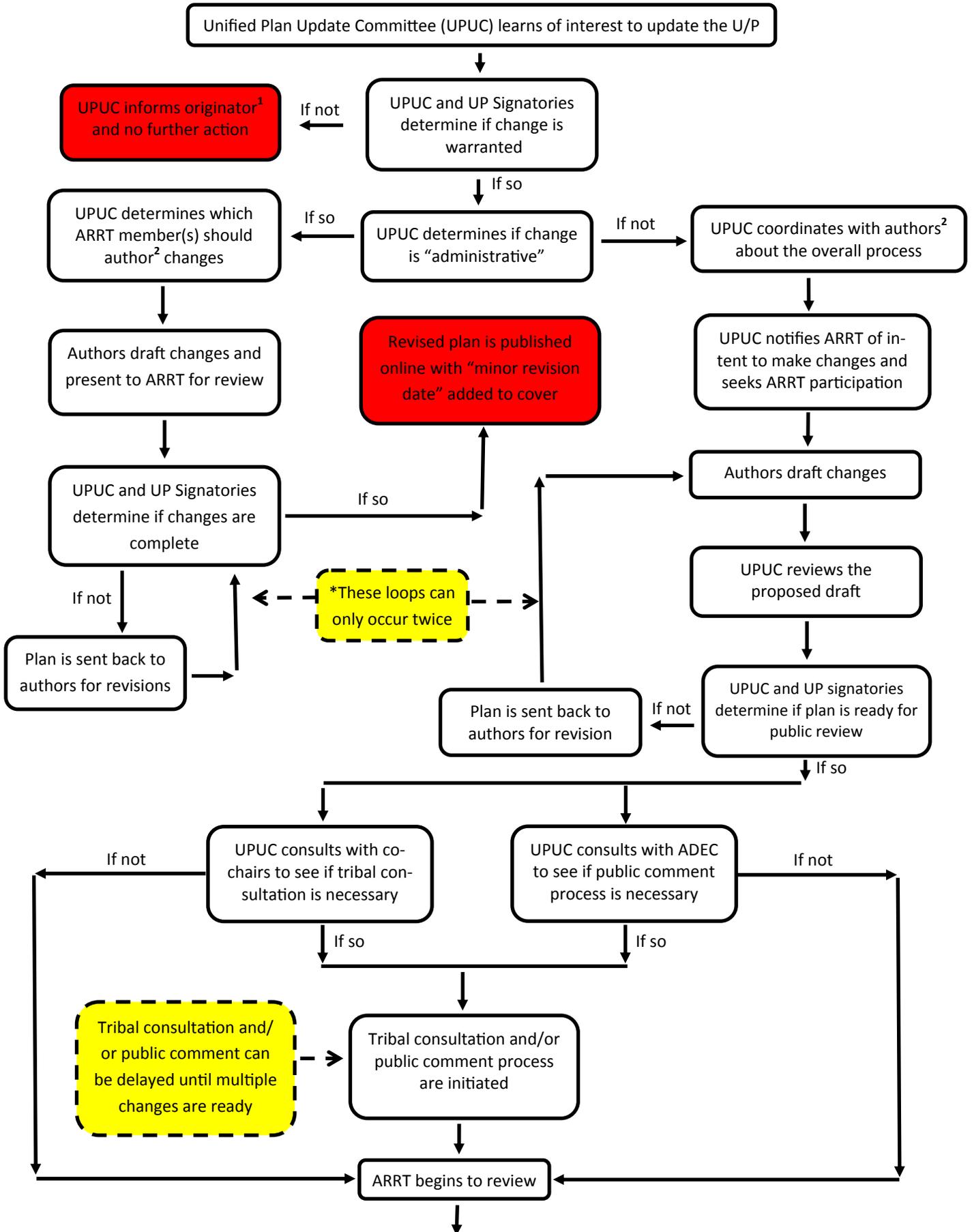
Subarea Committees, in consultation with appropriate Local Emergency Planning Committees, will periodically review and revise the subarea plans as necessary. Any part of this Plan or the ten subarea contingency plans may be changed as conditions warrant. For purposes of State of Alaska law and policy, the ten SCP's are referred to as Regional Master Oil and Hazardous Substance Discharge Prevention and Contingency Plans. Alaska State Code, [AS SEC. 46.04.210(a)] prescribes that ADEC “shall prepare, annually review, and revise as necessary a regional master oil and hazardous substance discharge prevention and contingency plan”.

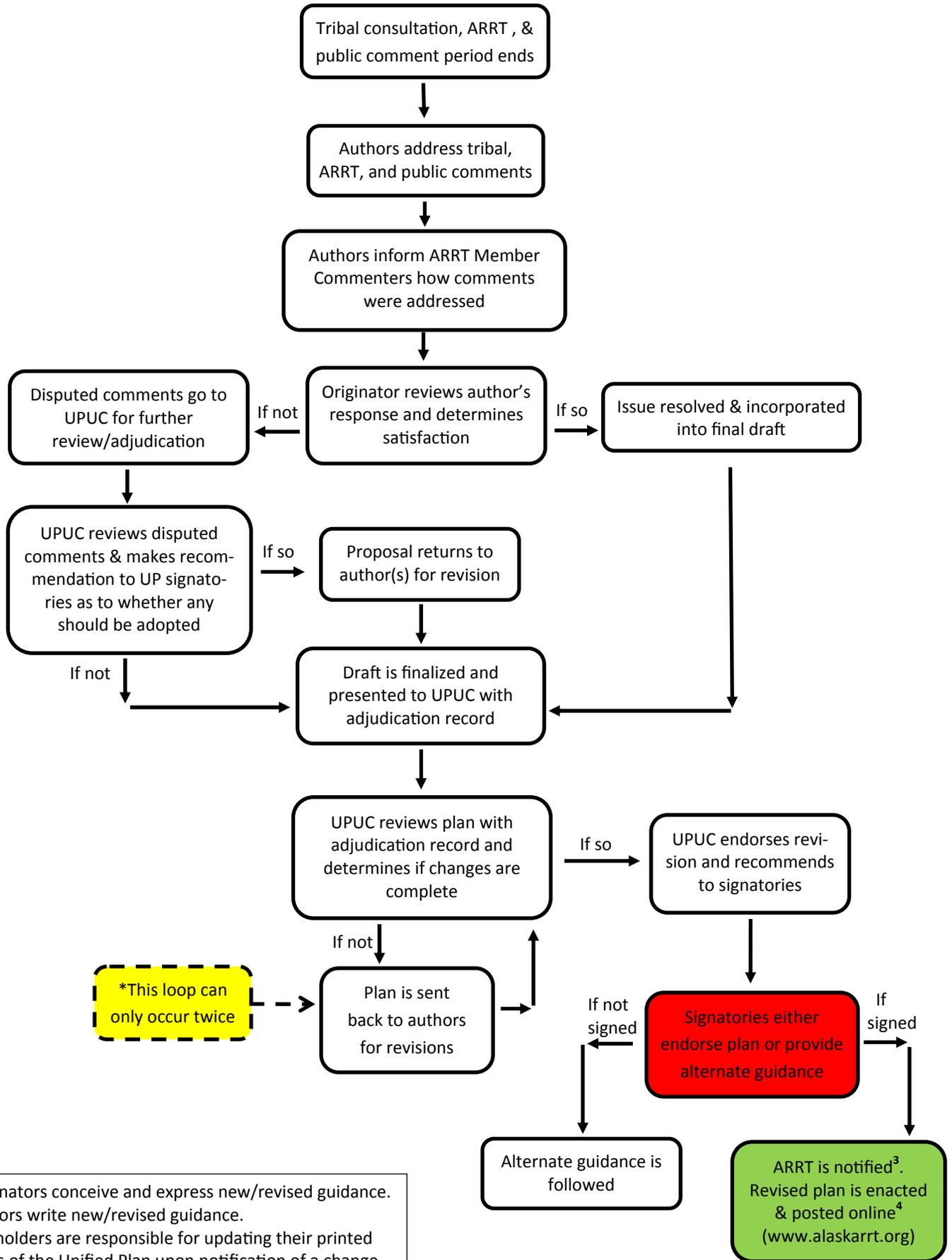
Whenever changes are posted to the Unified Plan or the Subarea Contingency Plans, this action must be noted on the [Record of Changes](#) page.

The ARRT Unified Plan Update Committee (UPUC) will manage the change process for the Unified Plan and make recommendations to the UP signatories. The role of the UPUC is to: serve as an intermediary body among ARRT members, workgroups, and UP signatories to facilitate changes to the UP; resolve discrepancies on proposed UP changes as they arise; and provide guidance about the revision process, to include clarifying instances where the process is unclear. The UPUC is responsible for overseeing, but not writing, proposed UP changes and will administer UP updates, at the direction of the UP Signatories. Appointments to the UPUC are made by the UP signatories; thus UPUC members guide UP revisions on behalf of their parent agencies. Members will normally include both planners and OSCs to ensure the UPUC is both aware of and responsive to the important needs of the OSCs. The overall process for development, review, and promulgation of the UP is depicted by *Figure 1, Unified Plan Review and Promulgation Process*.

Proposed administrative changes to the Unified Plan will be periodically provided to the ARRT for review. Any administrative changes requiring discussion by the ARRT will be discussed at the next ARRT meeting.

FIGURE 1: Unified Plan Review and Promulgation Process





¹Originators conceive and express new/revised guidance.
²Authors write new/revised guidance.
³Planholders are responsible for updating their printed copies of the Unified Plan upon notification of a change.
⁴The "Record of Changes" before Annex A and an online errata sheet (www.alaskarrt.org) will be updated.

APPENDIX II – EXERCISES AND DRILLS

TAB A – State Discharge Exercise Requirements (18 AAC 75.485):

The ADEC will, at its discretion, conduct announced and unannounced discharge exercises to assure that an oil discharge prevention and contingency plan is adequate in content and execution. No more than two exercises will be required in each twelve-month period, unless an exercise demonstrates (in the ADEC's judgment) a plan holder's failure to effectively implement the plan.

Execution of an industry contingency plan during a discharge exercise will be considered inadequate if the readiness for response and response performance stated in the plan are significantly deficient due to inadequate mobilization or performance of personnel, equipment, other resources, or other factors, including the mobilization or performance of a response action contractor identified under 18 AAC 75.445(i).

If a plan holder cannot adequately execute the plan during a discharge exercise, the ADEC will, at its discretion, require additional exercises until it is satisfied that plan execution is adequate, or take other appropriate action as described in 18 AAC 75.490.

The ADEC will consider a regularly scheduled training exercise initiated by a plan holder as a discharge exercise if the ADEC monitors, evaluates, or participates in the exercise and concurs that it is equivalent to a discharge exercise conducted by the ADEC. An industry contingency plan holder shall notify the ADEC in advance of the exercise and shall provide an opportunity for an ADEC representative to be present and participate.

The ADEC will conduct announced or unannounced discharge exercises appropriate to the plan holder's current status of operations.

TAB B – Federal Discharge Exercise Requirements:

The guidance contained in the National Preparedness for Response Exercise Program (PREP) will be used in conducting federally-mandated exercises. The PREP was developed to establish an exercise program that meets the intent of section 4202(a) of the Oil Pollution Act of 1990 (OPA), amending section 311(j) of the Federal Water Pollution Control Act by adding a new subsection (7) for spill response preparedness [33 U.S.C. 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 the oil and hazardous substance industry to adopt and sustain. The PREP is a unified federal effort and incorporates the exercise requirements of the Coast Guard, EPA, the Research and Innovative Technology Administration (RITA) Office of Pipeline Safety, and the Bureau of Safety and Environmental Enforcement. Following the PREP guidelines and participation in the PREP will satisfy all OPA-90 mandated federal pollution response exercise requirements.

The OSC (both Federal and State) shall periodically (annually at a minimum) conduct scheduled or no-notice oil pollution response drills to assess the effectiveness of this Unified Plan, the appropriate subarea contingency plan (for the location exercised), and relevant tank vessel and facility response plans.

The agency sponsoring the exercise/drill will be responsible for coordinating a joint evaluation team and issuing a single report that evaluates the overall exercise performance. The single evaluation report should be released within 45 days after completion of the exercise.

TAB C – Exercise Types

The purpose of response drills is to familiarize staff with basic spill response procedures and evaluation their effectiveness. Drill types include:

Notification Exercises:	intra-agency inter-agency (Federal, State) local-state-federal-industry
Tabletop Exercises:	intra-agency inter-agency (Federal, State) local-state-federal-industry
Field Exercises:	intra-agency inter-agency (Federal, State) local-state-federal-industry

Notification exercises merely test call-out plans and communications systems. Tabletop exercises entail gathering responders in one or several locations to test their ability to respond to scenarios. Field exercises entail actually moving personnel and equipment into the field to practice containment and cleanup. Logic dictates that drills progress over time from telephone to field. Once the system performs adequately during announced drills, the appropriate Federal or State agency may conduct unannounced spill drills in order to improve readiness among government personnel. The benefits of frequent exercising have to be weighed against the costs.

The Unified Plan can be exercised in cooperation with federal, State, local and industry drills to maximize the combined resources and improve coordination among the parties.

Internal exercises include:

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

External exercises include:

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

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 the interaction between the responsible party and the federal, State, and local government to exercise the Unified Plan, the appropriate subarea contingency plan, the responsible party's plan, and the local emergency response plan, if applicable. An adequate level of response equipment will be deployed, consistent with the scenario.

Additionally, over a three-year cycle, the exercise program should exercise the 15 PREP core components of the response plans. The 15 core components are:

- 1) Notifications
- 2) Staff Mobilization
- 3) Ability to Operate within the Response Management System described in the plan
 - Unified Command
 - Response Management System
- 4) Source Control
- 5) Assessment
- 6) Containment
- 7) Recovery
- 8) Protection
- 9) Disposal
- 10) Communications
- 11) Transportation
- 12) Personnel Support
- 13) Equipment Maintenance and Support
- 14) Procurement
- 15) Documentation

The Coast Guard's COMDTINST M3010.21 (Exercise Planning Manual) may also be used as an available tool for exercise planning and execution.

TAB D – Considerations for Field Deployment Exercises

Appropriate planning is necessary to ensure that field deployment exercises and geographic response strategy validation do not inadvertently impact lands or resources. Planners need to consult with appropriate entities early in the planning phase of any field deployment to: (1) determine whether the potential for negative impacts exists; (2) identify how to mitigate potential adverse effects; and (3) obtain necessary permits. All land/resource managers and land owners in and adjacent to the area where the field deployment will occur need to be consulted. The table below provides a list of the entities most likely to require consultation:

Entity	Resources Potentially Affected by Field Deployment Exercises
U.S. Department of the Interior	Threatened and endangered species and critical habitat
	Migratory birds (including bald eagles)
	Marine mammals (sea otters, walruses, and polar bears)
	Lands (e.g., National parks and wildlife refuges)
	BIA Native allotments and town sites Historic properties
U.S. Department of Commerce	Threatened and endangered species
	Marine mammals (pinnipeds and cetaceans)
	Essential fish habitat
	Commercial fisheries
U.S. Department of Agriculture	National forest lands
	Historic properties
U.S. Department of Defense	Military lands
	Historic properties
Alaska Department of Natural Resources	State lands (e.g., State parks, forests, wildlife refuges, and tidelands)
	Fish streams
	Historic properties
Alaska Department of Fish and Game	Fish and fish habitat
	Wildlife (migratory birds and marine and terrestrial mammals) and wildlife habitat
	State game refuges, critical habitat areas, and sanctuaries
	Commercial fisheries
Local government and private land owners	Lands