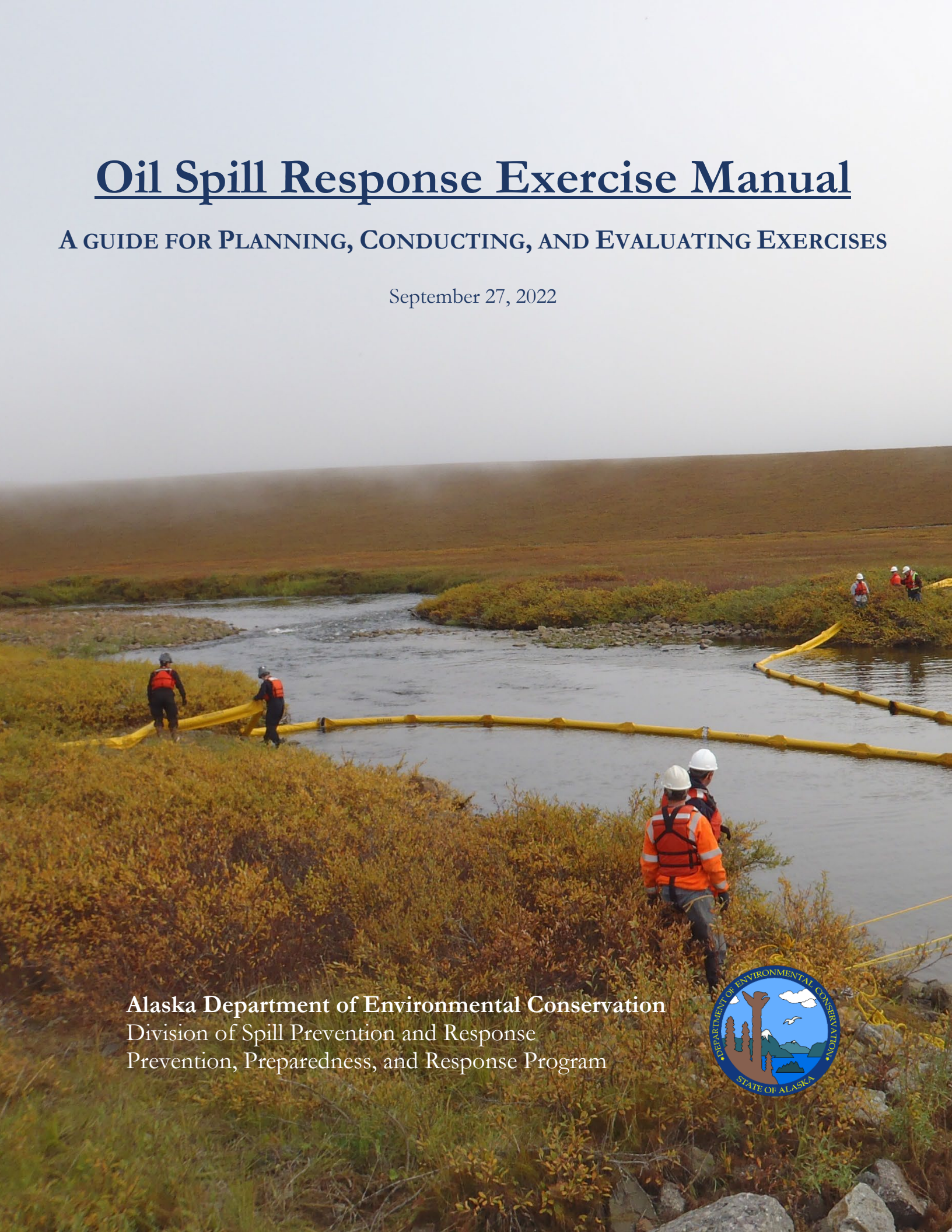
Oil Spill Response Exercise Manual

A GUIDE FOR PLANNING, CONDUCTING, AND EVALUATING EXERCISES

September 27, 2022



Alaska Department of Environmental Conservation
Division of Spill Prevention and Response
Prevention, Preparedness, and Response Program

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Front Matter

ACKNOWLEDGEMENTS

The Alaska Department of Environmental Conservation (ADEC) wishes to acknowledge the Department of Homeland Security Federal Emergency Management Agency's *Homeland Security Exercise and Evaluation Program* (HSEEP) doctrine and methodology as a core resource throughout the development of the ADEC *Oil Spill Response Exercise Manual* (Manual). ADEC's challenge has been to integrate HSEEP's high level and all hazard scope within the specific context of ADEC's authority for oil spill response preparedness. To this end, ADEC acknowledges the influence of the International Petroleum Industry Environmental Conservation Association – International Association of Oil and Gas Producers (IPIECA – IOGA) *Oil spill exercises guidelines* and its application of HSEEP to oil spill response programs as an industry best practice model.

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PREFACE

The Alaska Department of Environmental Conservation (ADEC) is pleased to present the *Oil Spill Response Exercise Manual: A Guide for Planning, Conducting, and Evaluating Exercises* (Manual). The Manual is part of a dedicated effort to improve ADEC's Oil Spill Response Exercise Program to better serve the needs of regulated oil operators, response action contractors, state and federal agencies, and other exercise stakeholders, while improving oil spill response readiness within the State of Alaska.

PURPOSE AND SCOPE

This Manual is intended to provide ADEC staff, Oil Discharge Prevention and Contingency Plan (ODPCP) and Streamlined Plan holders, response action contractors, partner agencies, and other stakeholders with a common framework on how to design and develop, conduct, and evaluate oil spill response exercises planned to meet plan holder's oil spill response exercise obligations. It is also intended to clarify State of Alaska oil spill exercise requirements and ADEC's role in exercises.

The exercise planning process described in this Manual adopts the Department of Homeland Security, Federal Emergency Management System's (FEMA) *Homeland Security Exercise and Evaluation Program* (HSEEP) methodology for exercises, which is based on national and international best practices. Adaptations have been incorporated into this Manual to align with ADEC's exercise program mission and purpose and to address Alaska-specific considerations. FEMA's HSEEP is available online at https://www.fema.gov/media-library/assets/documents/32326.

HSEEP provides a common methodology and terminology for planning, conducting, and evaluating exercises. There are four main phases to the HSEEP methodology, namely design and development, conduct, evaluation, and improvement planning. A more detailed description of each phase is provided in the exercise planning process section within this Manual.

As a flexible, scalable, and adaptable methodology, HSEEP is appropriate for the wide range of regulated facility types and sizes found in Alaska. In consultation with ADEC, this exercise planning process can be scaled to meet the focus and size of any exercise.

This Manual is considered a living document. As such, it will periodically be reviewed and updated to ensure clear and current guidance and to be responsive to feedback and programmatic lessons learned. Because this document is adopted by reference into regulation, any future proposed updates will be made available to the public for review and comment.

Table 1: Record of Revisions

Revision Number	Revision Date	Revision Content
	April 16, 2018	ADEC Oil Spill Response Exercise Guidance
0	Draft October 27, 2021	Update regulatory citations to align with proposed Article 4 revisions dated November 1, 2021, clarifying language, corrections, and style and formatting updates throughout the Manual
1	September 27, 2022	Updates in response to public comments received on proposed Oil Discharge Prevention and Contingency Plan Regulations; technical edits; language clarifications

Overview of ADEC's Oil Spill Response Exercise Program

INTRODUCTION

The importance of oil spill response exercises is recognized by governments, industry, and potentially impacted stakeholders. Effective oil spill preparedness and response is based on emergency organization procedures, trained personnel, oil spill response equipment, and logistical support. An oil spill response contingency plan is the primary tool used to provide assurance that a facility's oil spill response capability is managed, organized, assessed, and improved upon as needed.

ADEC requires an approved ODPCP or Streamlined Plan for regulated facilities to ensure that the owner or operator has the resources, training, and experience needed to mount a timely and effective response should they have an oil spill. The ADEC Oil Spill Response Exercise Program is a key component of ADEC's mission to ensure preparedness and response capability of the regulated community.

ADEC staff recognize that they are part of a large Alaska oil spill response community, which includes state, federal, tribal, and local agencies, response action contractors, and regulated operators. This community has a common goal of effective oil spill preparedness and response. ADEC staff are dedicated to working with the response community to achieve these common goals while carrying out their duty under Alaska law.

ADEC has adopted guiding principles for the ADEC Oil Spill Response Exercise Program, as follows:

- Verify compliance with statutes and regulations relevant to an owner's or operator's ability to adequately respond to a spill
- Improve current levels of response readiness
- Encourage innovation and improvement
- Maintain consistency statewide
- Strengthen and broaden oil spill response capability and coordination throughout the response community
- Increase the value of oil spill response exercises for the entire response community
- Increase cost effectiveness of oil spill response exercises for ADEC and the regulated community

STATUTORY AND REGULATORY FOUNDATION

The State of Alaska legislature assigned ADEC broad oversight responsibilities for environmental protection with a specific mandate that includes the protection of public safety, public health, and the environment through prevention, preparedness, and response to oil and hazardous substance releases. ADEC's responsibility and legal authority to evaluate industry oil spill response capabilities and preparedness are founded in governing Alaska statutes (AS) 46.03.010, AS 46.03.020, AS 46.04.030, and AS 46.04.055, with implementing regulations promulgated in 18 AAC 75.

Regulated facility operations in Alaska are governed by strict legal requirements for industry oil spill response capability and preparedness. The broad range of regulated facility types subject to ODPCP and Streamlined Plans and demonstrated response capability requirements include large bulk storage or terminal facilities, laden crude and noncrude tank vessels or barges, crude oil pipelines, exploration or production operations, nontank vessels (NTV), and railroad tank cars. The following discussion introduces and identifies governing statutes (AS 46.04.030, AS 46.04.055) and implementing regulations for oil spill response exercises.

Alaska Statutes

Alaska oil spill preparedness and response statutory responsibilities and authority are based upon the premise that, while "an oil spill response plan that exists on paper may be evaluated intellectually, the plan, equipment, and people are evaluated together only through spill drills or through response to an actual spill" (Alaska Oil Spill Commission 1990, p.37). Under Alaska statute, a person may not operate a regulated oil facility, vessel, or railroad tank car in the lands or waters of the state unless they hold an ODPCP or Streamlined Plan that has been approved by ADEC and they are in compliance with that plan. ADEC may require a plan holder to demonstrate their ability to carry out the plan including oil spill response exercises and access to inventories of equipment, supplies, and personnel identified as available in the plan.

The statute that grants ADEC authority over regulated facility oil spill response exercises is AS 46.04.030(e), which states "…The department may require an applicant or holder of an approved contingency plan to take steps necessary to demonstrate the applicant's or holder's ability to carry out the contingency plan, including (1) periodic training; (2) response team exercises; and (3) verifying access to inventories of equipment, supplies, and personnel identified as available in the approved contingency plan."

ADEC Implementing Regulations

The regulations found in 18 AAC 75.485 and 18 AAC 75.565 provide a framework to implement provisions within AS 46.04.030(e), AS 46.04.055(i), and AS 46.04.055(k). These regulations address ADEC's authority to require plan holders to conduct exercises and to conduct department-initiated exercises.

Regardless of whether ADEC initiates an oil spill response exercise, or the plan holder conducts an exercise to meet ADEC requirements, **the primary objective of an exercise under department regulations is for the plan holder to demonstrate the ODPCP or streamlined plan is adequate in content and that it can be carried out by the operator**.

Table 2, Table 3, and Table 4 present synopses of the components of ADEC's regulatory authority for three categories of exercise requirements: ODPCPs for all plan holders except Streamlined Plans; Onboard Initial Response Action Exercises for noncrude tank vessels and barges covered by Streamlined Plans; and Streamlined Plan Cleanup Contractors and Incident Management Teams. The tables summarize ADEC's regulatory authority that serves as the foundation for this Manual.

Table 2: ADEC Regulatory Authority over ODPCP Exercises (does not include streamlined plans)

Components of ADEC Authority	Regulation Citation
The department may conduct announced and unannounced discharge exercises appropriate to the plan holder's current status of operations to ensure that an ODPCP is adequate in content and execution.	18 AAC 75.485(a)
At a minimum, plan holders must conduct the following exercises as appropriate to the plan holder's current status of operations:	18 AAC 75.485(b)
For an ODPCP, one operations-based discharge exercise for each 5-year plan approval cycle in coordination with the department, based on the HSEEP methodology described in this Manual.	18 AAC 75.485(b)(1)(A)
The department may require not more than one additional operations-based exercise in each 12-month period.	18 AAC 75.485(b)(1)(B)
Execution of an ODPCP during an operations-based discharge exercise will be considered inadequate if the readiness for response and response performance described 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 an oil spill primary response action contractor identified under 18 AAC 75.451(i).	18 AAC 75.485(c)
If a plan holder cannot adequately execute the plan during a discharge exercise, the department may 1) notwithstanding the limitations in 18 AAC 75.485(b)(1)(B), require additional exercises until the department is satisfied the plan and its execution are adequate; or 2) take other appropriate action in accordance with 18 AAC 75.490.	18 AAC 75.485(e)(1) and (2)
The department will consider a regularly scheduled training exercise or a PREP exercise initiated by a plan holder to be a discharge exercise, as required under 18 AAC 75.485(b)(1), if the exercise is operations-based, if the department participates in the planning and evaluation of the exercise, and if the exercise follows the procedures described in this Manual.	18 AAC 75.485(f)

Table 3: ADEC Regulatory Authority over Initial Response Exercises for Noncrude Oil Tank Vessels or Barges covered by Streamlined Plans

Components of ADEC Authority	Regulation Citation
The department may conduct announced and unannounced discharge exercises appropriate to the plan holder's current status of operations to ensure that the initial response actions in a streamlined plan for a noncrude oil tank vessel or barge are adequate in content and execution.	18 AAC 75.485(a)
At a minimum, plan holders must conduct the following exercises as appropriate to the plan holder's current status of operations:	18 AAC 75.485(b)
For each noncrude oil tank vessel or barge with a streamlined plan, the plan holder must conduct one exercise on board the vessel in each 12-month period to ensure on-going familiarity with onboard response equipment and response actions required under 18 AAC 75.429(a) and capability to conduct initial emergency response actions required under 18 AAC 75.426(5).	18 AAC 75.485(b)(2)
The exercise must be an operations-based initial emergency response actions drill as described in this Manual, and must include documentation of onboard personnel training and of readiness of onboard response equipment;	18 AAC 75.485(b)(2)(A)
The plan holder shall self-certify the exercise conduct, lessons learned, and any corrective actions taken as a result on a form supplied by the department.	18 AAC 75.485(b)(2)(B)
The plan holder will shall retain documentation of each exercise in retrievable form for five years and shall provide a copy to the department upon request.	18 AAC 75.485(b)(2)(C)
The department may conduct not more than one additional onboard operations-based initial emergency response actions exercise in each 12-month period.	18 AAC 75.485(b)(2)(D)
Execution of onboard initial emergency response actions during an operations-based exercise for a streamlined plan will be considered inadequate if the plan holder is not able to conduct initial response actions in a timely and effective manner or if the plan holder fails to complete and retain the required self-certification form for each onboard exercise as required under 18 AAC 75.485(b)(2)(B).	18 AAC 75.485(d)
If a plan holder cannot adequately execute the streamlined plan during a discharge exercise, the department may 1) notwithstanding the limitations in 18 AAC 75.485(b)(2)(D), require additional exercises until the department it is satisfied the streamlined plan and its execution are adequate; or 2) take other appropriate action in accordance with as described at 18 AAC 75.490.	18 AAC 75.485(e)(1) and (2)

Table 4: ADEC Regulatory Authority over Exercises for Streamlined Plan Cleanup Contractors and Incident Management Teams *(for Nontank Vessels and for Noncrude Oil Tank Vessels and Barges with approved Streamlined Plans)*

Components of ADEC Authority	Regulation Citation
The department conducts announced and unannounced discharge exercises to ensure that a streamlined plan cleanup contractor or incident management team is adequately prepared to act in the event of a spill.	18 AAC 75.565(a)
No more than two exercises will be required for a cleanup contractor or incident management team in each 12-month period. The department will consider other required discharge exercises conducted by the cleanup contractor in meeting this requirement.	18 AAC 75.565(a)
The performance of a cleanup contractor or incident management team during a discharge exercise will be considered inadequate if the cleanup contractor or incident management team does not respond in a manner consistent with the minimum registration standards of 18 AAC 75.561 and 18 AAC 75.562, as applicable.	18 AAC 75.565(b)
If the performance of a cleanup contractor or incident management team during a discharge exercise is considered inadequate under (b) in this section, the department may 1) require additional exercises until the department is satisfied that the performance of the contractor is adequate; or 2) take enforcement action as described in 18 AAC 75.570.	18 AAC 75.565(c)
The department will consider a regularly scheduled training exercise initiated by a cleanup contractor or incident management team as a discharge exercise if the department monitors, evaluates, or participates in the exercise and concurs that it is equivalent to a discharge exercise conducted by the department. A cleanup contractor or incident management team shall notify the department in advance of the exercise and shall provide an opportunity for a department representative to be present and participate.	18 AAC 75.565(d)
The department will conduct announced or unannounced discharge exercises appropriate to the current status of operations of the cleanup contractor or incident management team and the participation of the cleanup contractor or incident management team in other discharge exercises or response actions.	18 AAC 75.565(e)

Exercise requirements for plan holders are established in regulation as outlined in Table 2, Table 3, and Table 4. If a required exercise is inadequate, the department may require additional exercises for plan holders and for streamlined plan cleanup contractors and incident management teams. Additionally, if ADEC determines that additional exercises should be held to verify the plan holder's ability to implement their plan, the department may require not more than one operations-based exercise per year for each plan holder, streamlined plan cleanup contractor, and streamlined plan incident management team. This authority may be implemented on a case-by-case basis.

ADEC reserves the right to plan and conduct an announced or unannounced exercise of an ODPCP holder or streamlined plan holder; however, in most cases ADEC prefers to work cooperatively with plan holders. With proper coordination between the plan holder, cleanup contractor, or incident management team contractor and ADEC, regularly scheduled training exercises or PREP exercises may meet requirements for a discharge exercise under ADEC regulations, referred to as a 485 exercise.

When **485 exercise** is used in this Manual, it is inclusive of 18 AAC 75.485 and 18 AAC 75.565 discharge exercise requirements. The reference is made for convenience and is not intended to diminish the obligations of cleanup contractors and incident management teams that are subject to the provisions of 18 AAC 75.565.

State Staff Roles and Responsibilities

ADEC is the lead State of Alaska agency responsible for oversight of industry ODPCPs. The Alaska legislature acknowledged that expertise from other state departments such as Alaska's Department of Fish and Game (ADF&G) and Department of Natural Resources (ADNR) would be needed to assist ADEC in this oversight role [AS 46.04.030(j), 18 AAC 75.455(h)].

For the specific purpose of determining whether an ODPCP is adequate in content and whether the facility owner or operator can implement it effectively, at ADEC's discretion, state staffing for specific exercise roles may be supplemented with personnel from other state agencies. To ensure State of Alaska's concerns and interests are communicated and represented, ADEC, ADNR, and ADF&G (or other state agencies as needed) work as a team to support and evaluate ODPCP exercises.

ADEC or other state agency personnel may participate in an exercise of an ODPCP holder in the following roles:

- ADEC ODPCP Reviewer
- ADEC Exercise Planner
- State Exercise Player
- State Exercise Evaluator
- ADEC Improvement Planner

ADEC will assign the appropriate number of state staff to fill these roles based upon the scope of the exercise. For a small equipment deployment Drill, there may be one ADEC staff person filling all of these roles. In a complex Full-Scale exercise, ADEC may designate numerous state staff to exercise participant roles.

State of Alaska Roles

ADEC ODPCP Reviewer

The ADEC ODPCP reviewer leads the review of the ODPCP to determine whether it includes all the procedures and resources needed to respond to an oil discharge of any size, up to and including the facility's response planning standard (RPS) volume. The reviewer considers emergency procedures, personnel, training, equipment capacity, logistical support, the ability to protect environmentally sensitive areas, and the overall response scenario progression. The ADEC ODPCP reviewer also ensures that the ODPCP and, by association, the exercise design and development is consistent with the *Alaska Regional Contingency Plan* (RCP) and the applicable Area Contingency Plan (ACP). The ADEC ODPCP reviewer usually serves as the ADEC exercise planner, lead ADEC evaluator, and ADEC improvement planner, or will provide support to staff functioning in those roles.

ADEC Exercise Planner

The ADEC exercise planner will be designated to participate in the exercise design and development process including development of the date of the exercise, scope, objectives, scenario, Master Scenario Events List (MSEL), evaluation criteria, and coordination of ADEC and other state agency participation. The ADEC exercise planner is typically the same individual as the ADEC ODPCP reviewer. In keeping with HSEEP methodology, ADEC will assign an exercise planner that is able to make decisions for ADEC and the State of Alaska.

State Exercise Player

In an oil spill response exercise, state agency staff play in the Unified Command (UC) structure in virtually the same manner as they participate in an actual oil spill response, albeit with additional responsibilities. These responsibilities are to provide feedback for the evaluation, noting concerns or issues that may identify areas for improvement of an ODPCP holder's response preparedness, and to take note of when their assistance is beyond that expected of a trained and fully functioning IMT or field response. Consistent with the Alaska Incident Management System (AIMS) Guide and the Alaska RCP, state agency oil spill response roles fall into three categories: oversight of response operations, augmentation of a responsible party's or ODPCP holder's response, and government as the lead agency in the response (takeover). The differences in the state player roles during a response versus a 485 exercise are described in Table 5.

During a 485 exercise – state exercise, player roles are expected to fall into the category of **oversight** with a potential for augmentation. State participation in exercises and the purpose of **oversight** is twofold:

1. ADEC has a regulatory function to oversee response effectiveness
2. ADEC's goal for state staff players is to be actively engaged within the response structure and to provide guidance and technical assistance

State agency exercise players work under the direction of the SOSC and do not fill roles of trained and capable ODPCP holder staff, their representatives and contractors, or other federal agencies. The ODPCP holder has an obligation to be capable of staffing each IMT Section or Unit with trained personnel as described in their approved ODPCP. State staff will work closely with the ODPCP holder to provide support and assistance in order to maximize the overall success of the exercise.

The state's goal in an oil spill response exercise, as in an actual response, is to integrate as a partner into the response structure. To achieve this, state staff work to ensure the plan holder is clearly and promptly informed about issues of state interest and concerns of the SOSC. For instance, state Environmental Unit (EU) staff will provide the guidance, feedback, and support needed to ensure the successful development and implementation of a sensitive area protection plan without doing the work required of trained and capable ODPCP holder staff members.

ADEC's evaluation will consider input from state exercise player observations and state exercise players will contribute to the final evaluation and After-Action Report (AAR) developed with the exercise evaluation team (see a description of ADEC's role as exercise evaluators below).

Table 5: State of Alaska Player Roles during Response and a 485 Exercise

State Role	Response (AIMS 2-11)	485 Exercise
Oversight	State agencies assume an oversight role in every spill. State activities are limited to oversight when the SOSC determines the spiller or Responsible Party (RP) is adequately responding to a spill - the spiller neither requests nor needs augmentation. State agencies oversee an RP's response actions by setting joint objectives, reviewing and approving incident action plans, monitoring overall response actions, and reviewing and approving permits.	It is expected that state exercise players will function in an oversight capacity unless ODPCP holders are unable to fulfill their ODPCP commitments. State players oversee the ODPCP holder's actions by setting joint objectives, reviewing and approving incident action plans, monitoring overall response actions, and reviewing and approving permits. State players will note concerns regarding the ability of the ODPCP holder to respond in order to inform the evaluation and identify areas for improvement.
Augmentation	In addition to performing oversight duties, the state may augment an RP's cleanup efforts when necessary to contain the release, recover the product, and minimize impact to the environment.	State staff augmentation will only be provided to keep the exercise on track and shall be noted. In cases where augmentation is required in exercises, areas for improvement will be identified or corrective action, such as amendment of an ODPCP, additional training or exercises, may be required.
Take Over	The state assumes command of containment, control, and cleanup operations.	This role should not be applicable in a 485 exercise. If it is determined that takeover would be necessary, a compliance action is likely.

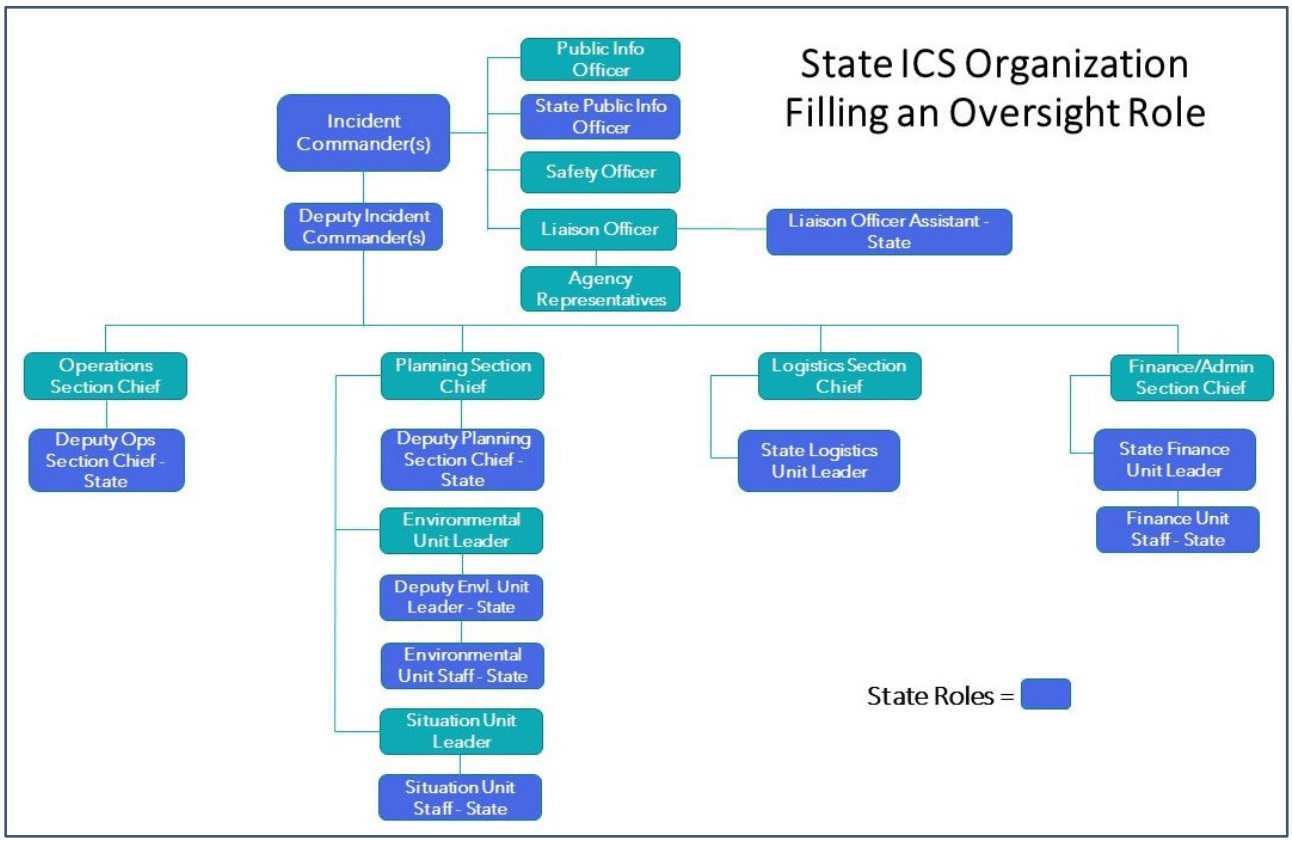


Figure 1 State ICS Organization Filling an Oversight Role

ADEC IMT Staffing Priorities

ADEC assigns state oil spill response and support staff within the Incident Management Team (IMT) based upon the scope of a response or exercise. In addition to the State On-Scene Coordinator (SOSC), ADEC prioritizes state staff assignment within the Environment Unit (EU), Liaison Officer (LO) and the Public Information Officer (PIO). For an IMT exercise, ADEC will place state personnel in as many IMT Sections as possible in consideration of the objectives, impact to state interests and schedule. For exercises with a field component, state field evaluators assess the functionality and efficiency of response strategies and tactics that are outlined within the ODPCP. These assessments may also include observations of equipment and personnel capability or limitations.

State Exercise Evaluator

In keeping with HSEEP methodology, ADEC will assign state staff to the role of exercise evaluator. The lead ADEC evaluator is typically the same individual as the ADEC ODPCP reviewer. ADEC may assign numerous evaluators dependent upon the scope of the exercise. State exercise evaluators have responsibilities that are distinct from state agency exercise players. Evaluators will assess the overall exercise (IMT role or field unit, as assigned) consistent with agreed upon objectives and Exercise Evaluation Guides (EEGs). The objectives and EEGs are established during the exercise planning phase.

The lead ADEC evaluator coordinates with the exercise controller as needed and applicable to the exercise. The lead ADEC evaluator must understand the ODPCP commitments and corresponding response operations to understand the significance of an action or activity as it unfolds in exercise

play. The lead ADEC evaluator is responsible to coordinate, consult, and manage state exercise evaluators. The lead ADEC evaluator works with the Lead Controller to ensure exercise play is reasonable, appropriately simulated and assessed, and that opportunities for objectives to be met are provided. ADEC's evaluation will focus on whether or not the ODPCP holder has demonstrated that the ODPCP is adequate in consideration of the exercise scenario and objectives and the associated pre-established EEGs. The focus is to assess whether the ODPCP holder has demonstrated they are adequately trained and capable to implement the ODPCP.

In summary, this means that the ODPCP holder is capable of activating and establishing the response organization, developing key objectives and a strategic approach, and deploying tactics effectively to contain or control, and clean up discharged oil with identified plan resources. State exercise players will also contribute to the exercise evaluation by providing feedback based on their player role observations and experiences. Observations and input from state players may also be gathered through exercise 'hot washes,' lessons learned, participant feedback forms, and other exercise debriefings.

ADEC Improvement Planner

The lead ADEC improvement planner is typically the same individual as the ADEC ODPCP reviewer, (who also typically serves as the ADEC exercise planner). Exercises are evaluated on the ability of the ODPCP holder to meet the exercise objectives and the ODPCP holder's ability to effectively respond based upon ODPCP commitments. After the evaluation phase concludes, the lead ADEC improvement planner will collect data from various resources, draft an exercise evaluation letter and ensure its review by the ADEC Unit Manager and SOSC for concurrence before sending to an ODPCP holder. Refer to the ADEC Exercise Letter discussion under the *Improvement Planning* section for additional information.

The ADEC improvement planner may use various resources including evaluation reports based on exercise evaluation of objectives, ADEC participant and evaluator feedback, and ADEC exercise lessons-learned debriefs and notes. ADEC shall document areas for improvement and any compliance issues that may need to be addressed in an exercise evaluation letter provided to the ODPCP holder. To ensure effective preparedness improvement as well as ODPCP compliance, areas for improvement and corrective actions identified during individual exercises are tracked by the ADEC improvement planner to completion. For more information regarding improvement planning, please refer to the Improvement Planning section towards the end of the Manual.

State Exercise Evaluator and Improvement Planner in a Streamlined Plan Noncrude Tank Vessel or Barge Onboard Initial Response Exercise

ADEC staff will not normally participate in an onboard initial response exercise for noncrude tank vessels or barges covered under a streamlined plan. If ADEC initiates an additional onboard initial response exercise, they will observe and note the thoroughness of the self-certification process, identification of lessons learned, and identification of corrective actions. ADEC evaluators will provide additional observations, and if the lessons learned or corrective actions do not adequately capture the exercise conduct, ADEC evaluators will determine additional steps to be taken as described in 18 AAC 75.485(e).

Scalable Participation and Evaluation

In all cases, the numbers of state personnel that participate to fill roles are scalable. ADEC and other state staff will participate at levels that are appropriate to the scope of the exercise, whether the exercise is a Drill or a Full-Scale Exercise. The limiting factors for state participation in an oil spill response exercise that an ODPCP holder intends to count for a 485 exercise include:

- Whether scheduling has occurred in a timely manner
- ADEC's involvement in exercise process

For ADEC initiated exercises, state staffing of the IMT, field, and evaluation roles will be appropriate for the exercise scenario and the focus of the exercise evaluation. For example, if ADEC intends to exercise a specific function of the IMT, sufficient state staff shall be assigned, or their input simulated where needed to facilitate an ODPCP holder's success.

During an oil spill response exercise, ADEC has a regulatory function to oversee a regulated facility owner's or operator's capability to carry out the ODPCP, but equally important is ADEC's goal to increase the value of an exercise for all parties by providing guidance and assistance as needed.

A summary of the key points for ADEC and state agency participation in a 485 exercise is provided below.

Key Points for ADEC and State Agency Exercise Participation

- State agency personnel work for the State On-Scene Coordinator. State staff will work in partnership with their local, tribal, and federal agency counterparts and the ODPCP holder to facilitate efficient exercise planning and execution, represent state interests, and achievement of UC objectives.
- ADEC prioritizes staff positions that provide value and a means of ensuring SOSC priorities are successfully addressed in the exercise. The state will provide appropriate state support to achieve UC exercise objectives.
- State players participate in 485 exercises in an oversight role. There is a potential for state players to augment a 485 exercise to keep the exercise in play.
- ADEC provides state evaluators for the exercise evaluation team who evaluate the adequacy of the ODPCP and the operator's ability to implement it. ADEC exercise players provide input into the evaluation from the perspective of whether the response was effective and whether it aligns with the approved ODPCP.
- State player UC staff are to evaluate the ability of the ODPCP holder to respond to the scenario as they would in a real event.

How PREP and ADEC's Exercise Program Interact

ODPCP holders in Alaska must meet oil spill response exercise requirements for federal regulatory agencies as well as those for ADEC. While federal compliance is not the focus of this Manual, ADEC recognizes that there are parallels between state-regulated and federally-regulated facility response exercise obligations. These parallels present opportunities for plan holders to coordinate their exercise program to meet both state and federal exercise obligations. ADEC strongly supports and encourages ODPCP holders to do this, as the benefits are many. Such efforts reduce the number of exercises imposed on plan holders; reduce the cost of exercises for plan holders, state and federal agencies, local governments, and other stakeholders; and improve overall exercise and response coordination statewide.

To meet federal oil pollution response plan exercise obligations, federally-regulated facilities often choose to use National Preparedness for Response Exercise Program (PREP) Guidelines. "PREP is a unified federal effort and satisfies the exercise requirements of the U.S. Coast Guard (USCG), the Environmental Protection Agency (EPA), the Pipeline and Hazardous Materials Safety Administration (PHMSA), and the Bureau of Safety and Environmental Enforcement (BSEE). Completion of the exercises described in the PREP Guidelines is one option for maintaining compliance with OPA 90-mandated federal oil pollution response exercise requirements." (PREP, 2016, p. 1-1) Although many regulated facilities maintain compliance with PREP to satisfy federal agency-specific response exercise regulations, PREP is a voluntary program and regulated operators may elect to establish their own exercise program in lieu of it. PREP Guidelines are intended to represent the minimum requirements for ensuring adequate response preparedness. Distinctly stated within PREP, "If government, industry, or plan holders desire to expand their exercise programs beyond the PREP Guidelines, they are highly encouraged to do so" and "some plan holders have adopted Homeland Security Exercise and Evaluation Program (HSEEP) exercise design guidance for OPA 90 exercises." (PREP, 2016, p. 1-1)

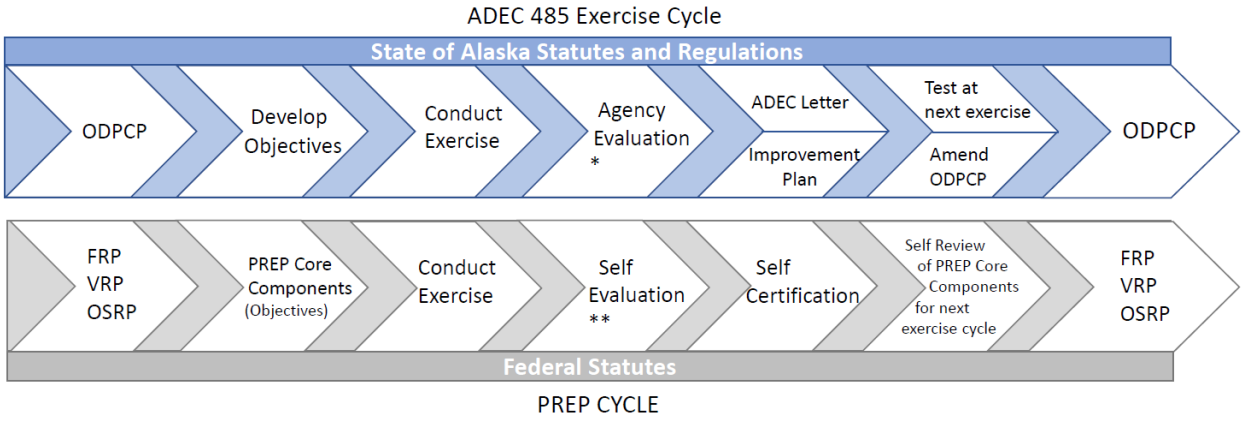
ADEC's Oil Spill Response Exercise Program builds upon most aspects of the PREP Guidelines to ensure the validity of State of Alaska approved ODPCPs. Table 6 presents PREP plan holder exercise types (PREP, 2016 p. 2-1) that may align with, and be expanded upon to address, an ODPCP holder's response preparedness obligations. The successful completion of an exercise is fully dependent upon coordinated exercise planning with ADEC ODPCP reviewers.

Table 6: Potential Alignment Opportunities for PREP and ADEC 485 Exercises

PREP Exercise Type	485 Exercises (565 for Streamlined Plan Contractors)	Notes and Recommendations
Qualified Individual (QI) notification exercises	May partially satisfy state requirements	ADEC expects a broader stakeholder notification process inclusive of state agency resources trustees.
Remote assessment and consultation exercises for vessels	ADEC does not require this exercise type	ADEC recognizes that use of a vessel assessor is specific to USCG planning requirements. Not a response planning component under 18 AAC 75. Outside ODPCP scope.
Emergency procedures exercises for vessels	May satisfy state requirements	Coordinate with ADEC ODPCP reviewer to ensure exercise will be scaled to satisfy 485 needs as well as PREP requirements.
Emergency procedures exercises for facilities	May partially satisfy state requirements	Coordinate with ADEC ODPCP reviewer to ensure exercise will be scaled to satisfy 485 needs as well as PREP requirements (e.g., the exercise may be scaled to address a full 485 RPS scenario).
IMT exercises	May satisfy state requirements	Coordinate with ADEC ODPCP reviewer to ensure exercise will be scaled to satisfy 485 needs as well as PREP requirements (e.g., the exercise may be scaled to address a full 485 RPS scenario).
Vessels - shore-based salvage and marine fire-fighting management team exercises.	ADEC does not require this exercise type	ADEC recognizes that planning and preparedness for vessel salvage or firefighting is specific to USCG requirements. This planning component is beyond the ODPCP scope under 18 AAC 75.
Equipment deployment exercises	May satisfy state requirements	Scaled appropriate to the facility and include strategies and tactics described in the ODPCP, up to and inclusive of the RPS scenario.
Government Initiated Unannounced Exercise (GIUE)	May satisfy state requirements	ADEC supports the use of unannounced exercises as a tool for assessing response readiness. ADEC tends to use this tool sparingly and will jointly conduct unannounced exercises with agency partners.

To receive recognition for completion of a 485 exercise, ADEC staff *must* be included in all phases of the exercise cycle, including the design and development, conduct, evaluation, and improvement planning phases. ADEC staff participation in the exercise planning process allows for the inclusion of specific ODPCP response obligations in an exercise in addition to federal PREP requirements. This can be done by building upon the PREP core components to meet ADEC requirements.

ADEC staff must be provided sufficient notice to participate in the first planning meeting of a 485 exercise whether it's a Concept and Objectives Meeting or an Initial Planning Meeting (see How and When to Schedule Exercises section below for recommended timeframes). Figure 2 provides a general comparison of key components of PREP and ADEC's 485 processes.



*Streamline plan on-board initial response exercises are self-evaluated and self-certified
**Government initiated unannounced and BSEE-regulated offshore facilities exercises may be subject to agency evaluation

Figure 2 Comparison of key components of ADEC's 485 and the PREP exercise cycles

How and When to Schedule Exercises

As noted in regulation, ADEC will consider an ODPCP holder's regularly scheduled training exercise as meeting state requirements if ADEC considers it equivalent to an exercise they would require (i.e., a 485 exercise). The first step to have the training exercise be considered equivalent to an ADEC-required exercise, is to provide ADEC the opportunity to participate in the exercise planning process. To ensure ADEC participation, ODPCP holders must notify ADEC of their intent to conduct an exercise well in advance. This includes coordinating ADEC participation in the first exercise planning meeting, whether it's a Concept and Objectives Meeting or an Initial Planning Meeting, to ensure appropriate ADEC personnel will be available and to make full use of the exercise opportunities. Exercises should also be scheduled at a time of year that corresponds to the exercise scenario and scope. For the purpose of validating the ODPCP, this may be a critical consideration when field deployment is included as part of the exercise scope.

The needed planning period for an exercise is dependent upon the scale and complexity of the exercise method. ADEC's use of operations-based exercise for 485 exercises is discussed within the Exercise Methods section of this Manual.

The typical HSEEP planning periods projected for operations-based exercise methods, described under the Exercise Methods section, are as follows:

- Drill: 2-4 months
- Functional Exercise: 6-9 months
- Full-Scale Exercise: 6-12 months

Appendix A provides an example exercise planning task list for a Full-Scale Exercise detailing numerous tasks that may need to be addressed.

Streamlined plan holders for noncrude tank vessels and barges do not need to schedule the required onboard initial response exercises with the department. However, self-certification records for those exercises must be maintained for five years and made available to the department upon request.

ADEC Exercise Scheduling Tool

ADEC has created an exercise schedule that is posted on the Spill Response Exercises webpage: https://dec.alaska.gov/spar/ppr/prevention-preparedness/exercises/schedule/. The scheduling tool allows exercise planners to proactively schedule exercises and raises awareness of when oil spill response exercises are occurring to avoid scheduling conflicts.

There are several steps to coordinating with ADEC to schedule an ODPCP holder exercise:

1. The ODPCP holder will initiate the exercise scheduling process by notifying their ADEC ODPCP reviewer of a proposed date for the exercise. The final date of the exercise will be coordinated with ADEC and other participants.
2. The ADEC ODPCP reviewer and ODPCP holder will discuss the date in relation to the scope of the exercise to ensure it will be conducted at the best time of year to accomplish the anticipated exercise objectives.
3. The ADEC ODPCP reviewer will determine if there are any exercises already on the schedule and notify the ODPCP holder of any conflicts.
4. Once a tentative date is agreed upon, the ADEC ODPCP reviewer will ensure the date, location, and exercise type is included on ADEC's web-based exercise schedule.
5. The ADEC ODPCP reviewer will manage any changes in date, location, or exercise method and ensure the schedule is updated accordingly.
6. Streamlined Plan holders are not required to schedule onboard initial response operations-based exercises with ADEC.

ADEC Unannounced Exercises

Unannounced exercises will not appear on the exercise schedule. ADEC may choose to work with someone from the ODPCP holder's organization as a trusted agent to coordinate the exercise. A trusted agent is an individual on the exercise planning team that is trusted to not inform the players of the exercise or scenario.

Exercise Methods

The main objective of every ADEC recognized 485 exercise is to validate the ODPCP by ensuring it is adequate in content and that the ODPCP holder can carry it out effectively. There are two broad categories of exercise methods described in HSEEP, namely discussion-based and operations-based methods. The operations-based exercise methods are the applicable means for meeting ADEC 485 exercise requirements.

Operations-based exercises are action-oriented and are characterized by an actual reaction to an exercise scenario.

Operations-based exercises include Drills, Functional Exercises, and Full-Scale Exercises, further detailed below. These exercise methods provide opportunities to assess an ODPCP inclusive of its relevant policies, agreements, strategies and tactics, response roles and responsibility capabilities, and to identify resource gaps. Exercises conducted to validate the ODPCP also provide valuable opportunities for improvement.

Drills

A Drill is a coordinated, supervised activity usually employed to validate a specific function or capability. Drills are commonly used to test new equipment, validate procedures, or practice and maintain current skills. For example, a Drill may be used to test the notification procedures within an ODPCP or to verify an exclusion booming tactic to protect a sensitive shoreline resource. A Drill is useful as a stand-alone tool, but a series of Drills can be used by ADEC or an ODPCP holder to prepare for a Full-Scale Exercise.

Functional Exercises

ADEC and the Alaska spill response community often refer to Functional Exercises as tabletop exercises which should not be confused with Tabletop Exercises under HSEEP which are discussion-based. Functional Exercises are designed to validate capabilities, multiple functions and sub-functions, or interdependent groups of functions. Functional Exercises are typically focused on exercising an ODPCP holder's IMT, who are critical to the management, direction, and command and control functions of oil spill response. In a Functional Exercise, events are projected through an exercise scenario with event updates that drive activity typically at the management level. A Functional Exercise is conducted in a realistic, real-time environment; however, movement of personnel and equipment is usually simulated.

In a Functional Exercise, a Lead Controller typically works to ensure participant activity remains within predefined boundaries and aligns with the scenario assumptions. The Lead Controller also ensures the exercise presents opportunities for players to play against the objectives. A MSEL may guide exercise role players in a Simulation Cell (SimCell) to use injects when needed to simulate real events. The purpose of a simulation or inject is to present opportunities for exercise players to meet the exercise objectives. Additional information on the development of a MSEL, simulations, and injects may be found in the Manual section *Preparation of the MSEL* and within HSEEP, pages 3-23 and 3-24.

Full-Scale/Combined IMT and Field Exercises

Full-Scale Exercises, combining resources from both the IMT and the field, are typically the most complex and resource-intensive exercise method. They may involve stakeholders that include Local On-Scene Coordinators, Tribal On-Scene Coordinators, and other organizations and regulatory agencies, both state and federal. A Full-Scale Exercise can serve to validate many facets of preparedness and may be held to test an ODPCP across the breadth of its commitments. They often include many players operating in the IMT or UC.

In a Full-Scale Exercise, events are projected through an exercise scenario with injects that drive activity at the operational level. Full-Scale Exercises are usually conducted in a real-time, stressful environment that is intended to mirror a real incident. Personnel and resources may be mobilized and deployed to the scene, where actions are performed as if a real incident had occurred. The Full-Scale Exercise simulates reality by presenting complex and realistic problems that require critical thinking, rapid problem solving, and effective responses by trained personnel.

The level of support needed to prepare for, and conduct, a Full-Scale Exercise is greater than that needed for Drills or Functional Exercises; although, a large Functional Exercise may require SimCell support to simulate field-operations and to advance the scenario and exercise play. The exercise site is usually large and site logistics require close monitoring. Safety issues, particularly regarding on-scene and in-field oil spill response equipment operations, must be monitored. Throughout the duration of the exercise, many activities occur simultaneously.

Streamlined NonCrude Tank Vessel and Barge Plan Initial Response Action Exercises

If noncrude tank vessels and barges with less than 500 barrels capacity are covered under a streamlined plan, each vessel is required to conduct one operations-based onboard initial response action exercise in each 12-month period. In this exercise, the vessel crew is required to demonstrate their familiarity with onboard response equipment and immediate reporting capability. They must verify onboard personnel are trained to conduct both actions. Personnel are not required to deploy consumable response equipment such as sorbent boom; however, deploying the boom deployment vessel is a recommended component of the exercise. ADEC personnel are not required to participate the initial response exercise, and the plan holder is not required to schedule this type of exercise with ADEC. The plan holder must self-certify the exercise, lessons learned, and any corrective actions on a form provided by the department. Records for initial response exercises must be maintained for five years.

This exercise method is specifically for noncrude tank vessels and barges with less than 500 barrels capacity that are covered under a streamlined plan. If a regulated noncrude vessel of that capacity is covered under an ODPCP, this exercise method cannot be used to in place of requirements for ODPCP holders.

OTHER EXERCISE METHODS

To ensure their organization can effectively respond consistent with the facility's state-approved ODPCP, ODPCP holders must have internal training programs. Internal training programs include training exercises. While training exercises do not meet the intent of a 485 exercise, ADEC values training opportunities both for industry as well as for state staff. ADEC appreciates opportunities for ADEC staff to participate in training exercises when requested by an ODPCP holder.

HSEEP's training framework includes a step-by-step progression of exercises inclusive of a range of discussion-based exercises. Typically focusing on strategic, policy-oriented issues, these discussion-based exercises can be used to familiarize players with, or develop new, plans, policies, agreements, and procedures. In discussion-based exercises, facilitators or presenters usually lead the discussion, keeping participants on track towards meeting the activities objectives. HSEEP provides detailed information on incorporating discussion-based exercises into training programs.

ADEC encourages all ODPCP holders to consider HSEEP concepts and principles when developing oil spill response exercise training programs. Discussion-based exercises do not meet ADEC 485 exercise requirements due to their non-demonstrative format; however, ODPCP holders may choose to use them as part of their internal training program.

Within the confines of an ODPCP holder's regulatory obligations, there may be other types of exercises which may be constructed to meet ADEC 485 exercise requirements. For example, ADEC may consider allowing deployment exercises to count for more than one ODPCP on a case by case basis if the primary response action contractor, response strategies and tactics and operating environment would be the same for each plan holder. ADEC encourages innovation and improvement in development of other exercise methods; however, coordination and approval from ADEC is required to ensure 485 exercise criteria is met.

Upon review, ADEC may grant exercise credit for an actual response if the response actions taken by the plan holder is similar in scale and scope to the response planning strategies in the contingency plan. If the response revealed implementation gaps, that may drive the need for another exercise.

The Exercise Planning Process

The HSEEP exercise planning methodology provides a consistent approach to planning and conducting oil spill response exercises. A primary benefit to ADEC is the ability to scale the methodology to the wide range of regulated operations (e.g., from small tank farms, crude oil tank vessels, to oil exploration and production facilities). While ADEC does not expect each step of each phase to be applied to every operator, application of the methodology should be coordinated with the ODPCP reviewer, who serves as ADEC's representative on the planning team, in part to ensure the exercise will meet ADEC 485 exercise requirements.

HSEEP's flexible, scalable, and adaptable methodology consists of four separate phases: exercise design and development, conduct, evaluation, and improvement planning, as depicted in Figure 3.

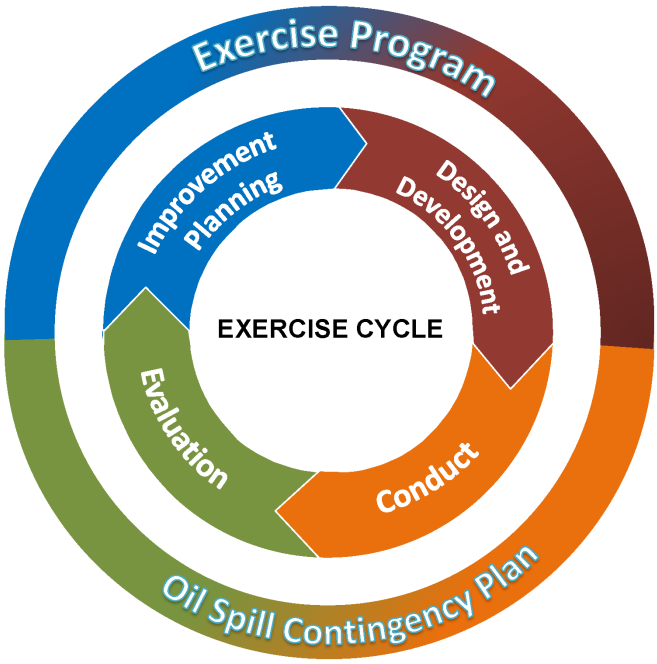


Figure 3 Exercise Planning Cycle, adapted from HSEEP 2020.

Each phase of HSEEP's exercise planning cycle methodology, adapted for 485 exercise application, is summarized in the following paragraphs. Each phase is discussed in additional detail within the following sections of the Manual.

Exercise Design and Development

In designing and developing an oil spill response exercise, exercise planning team members are identified, and planning team meetings are scheduled. During the meetings, the planning team will identify and develop exercise objectives, design the scenario, develop evaluation criteria, create documentation, plan exercise conduct and evaluation, and coordinate logistics.

Exercise Conduct

After the design and development activities are complete, the exercise play is ready to begin. Within the conduct phase of the exercise cycle, essential activities include briefing participants for exercise play, managing exercise play, and conducting immediate exercise wrap-up activities.

Exercise Evaluation

Evaluation is critical to an exercise that is used to validate an ODPCP. The exercise evaluation must be considered throughout all phases of the exercise planning cycle, beginning with the initial planning phases of the exercise to establish scope, objectives, and initiate exercise design. Effective evaluation assesses performance against exercise objectives and identifies and documents strengths and areas for improvement relative to specific ODPCP oil spill response capabilities.

Improvement Planning

During the improvement planning phase, the evaluation team analyzes data, observations, recommendations, and any areas for improvement or corrective actions that may be needed. Areas identified for improvement and corrective action must be tracked to completion or resolution, to ensure that the exercise affects preparedness improvements.

DESIGN PHASE

The design phase lays the foundation for development of the exercise. It is the first step in planning an exercise, it sets the parameters for subsequent phases and is essential to the overall success.

The design phase includes the following steps:

- Establish exercise planning team
- Set objectives
- Determine scope (i.e., size, exercise method, date, duration, participant level)
- Create a scenario to assess the objectives
- Develop Exercise Evaluation Guides (EEGs) and supporting documentation, processes, and systems to be used in the evaluation, control and simulation
- Obtain necessary approvals

For all exercises, the design process should follow the same steps but be scaled to align with the scope of the exercise. The exercise planning team, including the ADEC exercise planner, will coordinate during the process to align exercise design and development efforts.

Exercise Planning Team

The exercise planning team is responsible for exercise design, development, conduct, and evaluation. The planning team should be comprised of representatives from the ODPCP facility; ADEC and other state agencies; representatives from Federal On-Scene Coordinator area of responsibility (USCG or EPA) and supporting federal agencies; Tribal On-Scene Coordinator, and local stakeholders [such as Regional Citizen Advisory Councils (RCACs)], as appropriate. The planning team may be expanded to include subject matter experts to provide expertise for objective and scenario development and exercise evaluation. Support agencies and organizations should be included as necessary throughout the planning process.

In ODPCP holder-initiated exercises, the ODOCP holder will normally assume the role of the Planning Team Leader. The Planning Team Leader is responsible for the overall management of the exercise tasks across the whole process. The size of the planning team will be dependent upon the scale of the exercise and the exercise method. For a small equipment deployment or notification Drill, all the planning tasks may be addressed by one or two people. In a complex Full-Scale Exercise such as a spill of national significance (SONS) exercise for example, the planning team may consist of 10 or more people.

Table 7 identifies several fundamental considerations for planning team selection and discussion points for kick-off of an exercise planning process.

Table 7: Exercise Planning Team Key Considerations

Item	Key Considerations
1	ADEC must participate in the exercise process, including the first exercise planning meeting, in order for the exercise to be considered a 485 exercise.
2	All core exercise planning team members should be able to make decisions for their organization.
3	If avoidable, planning team members should not participate as players in the exercise, however they may serve as evaluators or in the SimCell. An example of an exception to this includes a Drill or Functional Exercise of limited scope where one staff person each from ADEC and the ODPCP holder may sufficiently plan and evaluate an exercise.

ADEC Exercise Planner Roles and Responsibilities

The ADEC exercise planner should be the ADEC ODPCP reviewer for the ODPCP being exercised. The ADEC exercise planner role and responsibilities include:

- Work with the planning team to develop the exercise date, scope, objectives, scenario, and evaluation guides in consideration of the specific ODPCP being exercised.
- Incorporate any conditions of approval, past exercise recommendations and lessons learned for the ODPCP being exercised. For the exercise to meet 485 requirements, ADEC may need to add objectives and evaluation criteria to the planning effort to address specific ODPCP components.
- As a member of the exercise planning team, ADEC will not press to have operator-proposed objectives deleted; however, when the objective is applicable to an ODPCP component, ADEC must concur with relevant 485 exercise evaluation criteria.
- Coordinate and ensure the number of evaluators and state participants needed to right-size state participation to the scope of the exercise.
- Coordinate state participant training or briefing needs as appropriate.
- Prepare additional ADEC evaluators (as needed) for the exercise.

ADEC exercise participants will be assigned to the exercise by the State On-Scene Coordinator (SOSC) or their designee. An SOSC may delegate these duties as needed.

Exercise Planning Meetings

This section describes the types of planning meetings most useful in exercise design and development phases. Table 8 provides a list of these exercise planning meetings and a summary of the intended focus. For each of the planning meetings identified in Table 8, detailed descriptions are provided in the following paragraphs that include: the meeting's general discussion points, useful tools, expected meeting outcomes, and additional follow-up needed.

The Exercise Planning Lead and planning team members will decide the type and number of planning meetings needed for a given exercise. The meetings are scalable based on the scope of the exercise. For the smallest of exercises, the exercise may be able to be planned in one meeting. Larger exercises may need many additional meetings to complete tasks such as developing objectives, and EEGs.

Table 8: Useful Planning Meetings during Exercise Design and Development Phases

Meeting	Focus
Concept and Objective (**Optional**)	Develop scope and objectives. This meeting may be needed for Functional and Full-Scale Exercises.
Initial Planning	Refine scope and objectives and develop scenario, evaluation criteria, and other planning activities.
Midterm Planning	Refine scenario, trajectories, evaluation criteria, conduct site visit and any other planning activities.
MSEL including injects **(Optional)**	Develop MSEL. This meeting may be needed for larger Functional and Full-Scale Exercises.
Final Planning	Final review planning activities and ensure logistics are set.

Concept and Objective Meeting

Primary Focus Summary

A Concepts and Objective Meeting is the formal beginning of the exercise planning process. It is held to develop the scope and objectives of the exercise. A Concepts and Objective Meeting helps planners determine: the exercise priorities to be addressed based on ADEC and ODPCP holder priorities; design objectives based on those priorities; align exercise objectives to ODPCP validation and improvement planning needs; and identify additional exercise planning team members.

The exercise planning team, including the ADEC exercise planner, will attend the Concept and Objective Meeting along with any subject matter experts needed to develop the scope and objectives of the exercise.

For less complex exercises, a Concepts and Objective Meeting can be conducted in conjunction with the exercise planning team's Initial Planning Meeting.

Table 9: Concept and Objective Meeting Details, Adapted from HSEEP 2020.

Concept & Objective (C&O) Meeting: This meeting is the formal beginning to the exercise process and identifies the scope and objectives for the exercise.	
Element	**Considerations and Activities**
Meeting Focus	The formal beginning of the planning process. Program priorities and objectives are determined during the C&O Meeting.
Discussion Points	• Exercise scope • Proposed objectives and aligned capabilities linked to the ODPCP • Exercise method • Location, date, and duration • Participants and anticipated extent of play • Exercise Planning Team makeup • Assumptions and artificialities • Control and evaluation concepts • Security organizations and structure as applicable • Available resources • Logistics • Planning timeline and milestones • Local issues, concerns, and sensitivities
Exercise Tools	• Meeting agenda and briefing, which includes the background and rationale for the proposed scope and objectives for the exercise
Exercise Outcomes	• Exercise concept • Exercise timeline (group consensus) • Extent of participant play • Identification of planning team members • Planning timeline, milestones, and meeting dates
Follow-up	Compile and distribute the C&O Meeting minutes and include the next meeting time, date, and location.

Initial Planning Team Meeting

Primary Focus Summary

An Initial Planning Meeting should be conducted for all exercises regardless of whether a Concepts and Objective Meeting is held. The purpose of this meeting is to determine or refine the exercise scope, objectives, evaluation criteria, and documentation needed to support exercise conduct and evaluation.

During an Initial Planning Meeting, planning team members are assigned exercise design and development tasks related to their specific area of responsibility and expertise.

Table 10: Initial Planning Meeting Details, Adapted from HSEEP 2020.

Initial Planning Meeting (IPM): A meeting held to refine the scope and objectives for the exercise.	
Element	**Considerations and Activities**
Meeting Focus	Formal beginning of the development phase. The IPM also focuses on refining the scope and the objectives for the exercise.
Discussion Points	• Clearly defined objectives capabilities linked to the ODPCP • Evaluation requirements, including Exercise Evaluation Guide (EEG) ODPCP response components being exercised, objectives, and critical tasks • Relevant plans, policies, and procedures to be evaluated • Exercise scenario • Modeling and simulation • Participants extent of play • Optimum duration of the exercise • Exercise planners' roles and responsibilities • Decision to record exercise proceedings (audio or video) • Local issues, concerns, or sensitivities • Discussion points typically covered during a C&O Meeting if one is not held • Consensus regarding the date, time, and location for next meeting
Exercise Tools	• Read-ahead document • Agenda material • Briefing for presenting an overview of the exercise and meeting discussion points • Map of proposed venue sites (operations-based) with description of local environment • Copy of proposed timeline and milestones for design and development • Copies of presentation briefing for meeting
Exercise Outcomes	• Any outcomes from C&O Meeting, if a C&O Meeting was not conducted • Clearly defined objectives and aligned ODPCP capabilities • Initial ODPCP response components to be exercised, objectives and critical tasks (reviewed and confirmed prior to the next meeting) • Scenario variables (scope, venue, conditions) • List of participating organizations and extent of play • Develop exercise draft documentation (Situation Manual, Exercise Plan, etc.) • Identification and availability of all source documents (plans, policies, procedures) needed for exercise documentation • Refined exercise planning timeline • Identification of available subject-matter experts (SMEs) (scenario vetting) • Preferred communication methods among planning team • Clearly identified and assigned responsibility for logistical issues • List of tasks to be accomplished by next planning meeting, to include date and responsible planning team member • Agreed-upon date, time, and location of next planning meeting
Follow-up	• Compile and distribute the IPM meeting minutes, including the next meeting time, date, and location • Between meetings the planning team collaborates on assignments and prepares draft exercise documentation • Distribute draft documentation prior to the next scheduled meeting

Midterm Planning Meeting

Primary Focus Summary

The Midterm Planning Meeting provides additional opportunities to engage the planning team and to settle logistical and organizational issues that may arise during exercise planning.

During a Midterm Planning Meeting, exercise organization, the scenario, evaluation criteria, timeline development, scheduling, logistics, and administrative requirements are discussed. The meeting is held to review draft documentation and, as time allows, may also be used to develop the MSEL, which outlines the exercise scenario chronology providing event synopses, injects, expected participant responses, objectives to be addressed, and associated responsible personnel (players and simulators).

For more complex exercises, a separate meeting may be held to develop a MSEL as discussed below.

Table 11: Midterm Planning Team Meeting Description, Adapted from HSEEP 2020.

Midterm Planning Meeting (MPM): A meeting that serves as a forum to develop exercise scenario details and timeline.	
Element	**Considerations and Activities**
Meeting Focus	The MPM is a continuation of the development phase. This meeting is primarily focused on scenario development and serves as a check-in for exercise product development.
Discussion Points	• Comments on draft exercise documentation • Construction of the scenario timeline • Development of the Master Scenario Events List (MSEL), if a MSEL meeting is not scheduled • Identification of exercise venue artificialities and limitations • Agreement on final logistical items • Assignment of additional responsibilities
Exercise Tools	• Agenda material • Briefing for presenting an overview of the exercise and meeting discussion points • IPM minutes • Draft scenario timeline • Draft documentation (Facilitator Guide, Controller/Evaluator [C/E] Handbook, etc.) • Other selected documentation needed to illustrate exercise concepts and provide planning guidance
Exercise Outcomes	• Reviewed exercise documentation (SitMan, ExPlan, etc.) • Draft Facilitator Guide or C/E Handbook, including EEGs • Well-developed scenario to include injects (if no MSEL Meeting is scheduled) • Agreement on the exercise site • Identified logistics planning requirements • Finalization of date, time, and location on the MSEL Meeting and Final • Planning Meeting (FPM)
Follow-up	• Compile and distribute the MPM meeting minutes, including the next meeting date, time, and location • Between meetings the planning team collaborates on assignments and prepares draft exercise documentation • Distribute draft documentation prior to the next scheduled meeting

Additional Planning Team Meetings and MSEL Meeting

Primary Focus Summary

The MSEL meeting focuses on detailing and developing the MSEL. It includes specific scenario or injects that prompt responders to implement the plans, policies, procedures, and protocols that require testing during the exercise. It also records the methods that will be used to provide injects (e.g., phone calls, radio calls, email, etc.) that may be used to initiate or prompt player action. Additional information on the development of a MSEL, simulations, and injects may be found in the Manual section *Preparation of the MSEL* and within HSEEP, pages 3-23 and 3-24.

For more complex exercises, one or more additional planning meetings or MSEL meetings may be held to review the master scenario timeline, simulations, and injects. If not held separately, topics typically covered in a separate MSEL meeting can be incorporated into a midterm planning meeting or the final planning meeting.

Table 12: Master Scenario Events List (MSEL) Meeting, Adapted from HSEEP 2020.

Master Scenario Events List (MSEL) Meeting: A meeting for operations-based exercises that serves as a forum to build the MSEL in detail.	
Element	**Considerations and Activities**
Meeting Focus	The MSEL meeting focuses on reviewing the timeline and developing the MSEL. Exercise planners from participating agencies, and organizations are included to identify activities that must occur during the exercise.
Discussion Points	• Tasks, conditions, and standards required to meet objectives • Key events and critical tasks • Event originator, target player, expected player actions, and timeframe • Contingency injects to prompt player action (if needed)
Exercise Tools	• Agenda material • Previous meeting minutes • Draft exercise documentation • Applicable plans, policies, and procedures • Agreed-upon template used to create the MSEL
Exercise Outcomes	• Key event injects and delivery timeline identified • Assignment of responsibility for conducting remaining events • Revisions of draft scenario-based documentation • Timeline for completion
Follow-up	• Compile and distribute the MSEL meeting minutes, including the next meeting date, time, and location • Between meetings the planning team collaborates on assignments and prepares draft exercise documentation • Distribute draft documentation prior to next scheduled meeting

Final Planning Meeting

Primary Focus Summary

The Final Planning Meeting is the final opportunity for reviewing exercise processes and procedures by the planning team.

To ensure that all elements of the exercise are ready for conduct, a Final Planning Meeting should be conducted for all exercises. Prior to meeting, the exercise planning team will receive final drafts of all exercise materials. No major changes to the exercise design, scope, or supporting documentation should take place at, or following, the Final Planning Meeting. The Final Planning Meeting ensures that all logistical requirements have been met, outstanding issues have been identified and resolved, exercise packets are ready for printing, and evaluators have been identified and assigned.

Table 13: Final Planning Team Meeting Details, Adapted from HSEEP 2020.

Final Planning Meeting (FPM): A meeting that serves as the formal end of the exercise planning process. It is held to finalize exercise documentation and logistics.	
Element	**Considerations and Activities**
Meeting Focus	Should be conducted for all exercises to ensure that all elements of the exercise are ready for conduct. Prior to the FPM, the planning team receives final drafts of all exercise materials. No major changes to the exercise's design, scope, or supporting documentation should take place at or following the FPM.
Discussion Points	• Conduct a comprehensive final review • Approve all remaining draft documents (for example, SitMan, MSEL, C/E Handbook) and presentation materials • Resolve any open planning issues and identify last-minute concerns • Review all exercise logistical activities (for example, schedule, registration, attire, special needs)
Exercise Tools	• Agenda materials • Briefing for presenting an overview of the exercise and meeting discussion points • Previous meeting minutes from the IPM, the MPM, and the MSEL, if needed • All draft exercise documents and documentation • Previously finalized documents
Exercise Outcomes	• Final approval of exercise documents and material for production • Identified issues resolved • Attendees understand and approve exercise processes and procedures • Task assignments and logistical elements, including facilities, equipment, and schedules are confirmed
Follow-up	• Finalize all publications • Prepare all supporting materials • Rehearse briefings • Prepare to conduct the exercise • Disseminate documentation and any additional instructions to all appropriate personnel prior to the exercise

Exercise Scope

Determining exercise scope is about sizing the exercise to meet the objectives while taking into consideration and balancing the resources and personnel constraints of the ODPCP holder, ADEC, and other organizations participating in the exercise.

The first step in delineating the exercise scope is determining what exercise method is appropriate. If the overarching objective of the exercise is to evaluate an ODPCP holder's notification procedures, a Functional Exercise may be the best choice. If the overarching objective is to test a specific piece of spill response equipment, a Drill may be the best choice.

Key elements that should be considered in determining the scope of the exercise include the following:

- Aspects of the ODPCP that will be tested during the exercise
- ODPCP holder and ADEC priorities
- Exercise method
- Participation level
- Exercise duration
- Exercise location

Using these considerations as a guide, exercise planners should be able to determine the exercise method that is appropriate for validating the ODPCP and other exercise parameters, such as what should be included in the exercise scenario and what should not be exercised.

Exercise Objectives

For ADEC, the overarching objective of a 485 exercise is to ensure that an ODPCP is adequate in content and the plan holder can carry it out, up to and including the RPS volume. In general, any given exercise will not comprehensively assess an ODPCP holder's response capability, but rather focus on one or more components of their program. The planning team, inclusive of ADEC, develops and incorporates a reasonable number of specific, measurable, achievable, relevant, and time-bound (SMART) objectives to serve as a foundation during exercise planning. Objectives should be developed in consideration of lessons learned from past exercises and conditions unique to the facility.

The planning team should establish SMART objectives that can be measured and achieved in a given time frame. Table 14 presents HSEEP's SMART guidelines, modified for application for Alaska ODPCP holder 485 exercises. These guidelines are aligned with HSEEP's SMART approach.

Table 14: SMART Guidelines for 485 Exercise Objectives

SMART Guidelines for 485 Exercise Objectives	
Specific	Objectives should specifically address what needs to be done within the timeline for completion. Each objective should address the 'who, what, when, where, and why.'
Measurable	Objectives should establish a clear goal with an observable action or outcome. Objectives may also include descriptive measures that define the quantity and quality of successful completion.
Achievable	Objectives should be within the control, influence, and resources agreed to for exercise play and participant actions. Objectives should be aligned with the ODPCP holder obligations.
Relevant	Objectives should be integral to the demonstration of response capability of the ODPCP holder.
Time-bound	All objectives should incorporate specified and reasonable timeframes, in consideration of achievability.

In the development of objectives, the planning team may consider several points of interest. These may include regulatory commitments or requirements, areas that were previously identified as needing correction or improvement during previous exercises, or exercise obligations associated with ODPCP approval. Oil spill response exercise objectives must be established in alignment with the provisions of the RCP and the applicable ACP.

Exercise conduct actions that are performed to meet the objectives must also be executed consistent with the RCP and applicable ACP. For example, if an objective includes demonstrating the capability to complete a request for approval for aerial dispersant application, the procedures in the RCP, Part III, Subpart A. *Chemical Dispersants* and Section 3260.1 – *Dispersants,* of the applicable ACP, are to be followed during exercise conduct. Table 15 provides several example objectives for the operations-based exercise methods that ADEC may use for validation of an ODPCP.

Evaluation Requirements

It is essential for the exercise planning team, inclusive of an ADEC exercise planner, to develop EEG's early in the exercise design process. Identifying evaluation requirements helps to guide the development of the exercise scenario and discussion questions. Evaluation requirements clearly articulate what will be evaluated during the exercise and how exercise play will be evaluated. An EEG should be used to document this information. An EEG development is discussed in more detail within the Exercise Evaluation section of this Manual. An EEG template and instructions are provided in Appendix C.

Table 15: Example Objectives by Exercise Method and Response Component

Method	ODPCP Component	Objective Examples
Drill	Initial Response Actions	• Response Team activated within specified time frame. • Notifications are made consistent with agency requirements. • Potentially affected stakeholders are notified. • Source control measures initiated within specified time frame. • Containment measures activated within specified time frame.
Drill	Priority Protection and Recovery Tactics	• Response team deploys deflection boom effectively and within specified time frame. • Oil collection boom and recovery skimmers are deployed and functional within specified time frame. • Oil storage is functional to facilitate on-going recovery operations as specified in ODPCP.
Functional	Incident Management Team	• Establish functional IMT and Unified Command within specified time frame. • Establish IMT and field communication capability within specified time frame. • Establish coordination with resource trustees. • Identify priority protection sites with agreed upon tactics within specified time frame. • Demonstrate liaison ability to engage with potentially affected communities and organizations within specified time frame.
Functional	Operations / Logistics Sections	• Demonstrate establishment of functional resource request process within specified time frame. • Demonstrate access to resources established in ODPCP and availability within specified time frame – use realistic mobilization and deployment times.
Full-Scale (combined IMT and field exercise)	May be scaled to full RPS scenario	• Establish UC and IMT within specified time. • Demonstrate access to resources and functional capability of field response.

Exercise Scenario Development

An exercise scenario provides a written outline of the simulated event and its anticipated development over time. The scenario may be written as a narrative or depicted by an event timeline.

Many exercise players from Alaska may consider 'the scenario' the information given at the start of play (i.e., description of the exercise spill and actions taken up to the start of the exercise). However, the spill description provided at the start of play is only a piece of the full scenario developed by the exercise planning team. During the exercise design and development phases, the

exercise planning team must consider anticipated actions by the exercise players and agree upon the results of those simulated actions to further continued play. This ensures that an exercise is adequately simulated to allow player opportunity to meet an objective. The ultimate goal of the scenario is to ensure that the players address exercise objectives.

The full scenario should not be provided to the exercise players. Players should receive an appropriate description of the spill incident and any initial actions that have occurred up to the start of the exercise. If the players are provided with the full scenario that is within the hands of the controllers, the elements of oil spill response decision making may lead to the exercise becoming more of a show than a true demonstration of capabilities. Exercise controllers have the important task and challenge of making sure that scenario information is made available to players in a timely and realistic manner, but not so much that it scripts the actions of the exercise players.

An ODPCP holder is obligated to ensure that responders are adequately trained to respond to a spill should they have one. While an ODPCP holder may find it beneficial to conduct player refresher training in advance of a 485 exercise, especially for complex exercises, care must be taken to avoid revealing the full scenario.

The exercise planning team should select and develop scenarios that enable an exercise to assess objectives and responder capabilities. All scenarios should be realistic, plausible, and challenging. However, designers must ensure the scenario is not so complicated that it overwhelms the exercise players. Using the actual conditions of the day (i.e., weather and tides) is a more realistic and preferred way to run an exercise, unless achieving a particular objective requires a specific simulated condition.

The ODPCP should be referred to for potential scenarios, facility information, environmentally sensitive areas and to identify other areas of high socioeconomic value that need to be protected under scenario conditions. To validate an ODPCP holder's response capabilities in different situations and environmental conditions, the scenarios should vary from exercise to exercise. The focus of an exercise scenario and its objectives may be to address past exercise lessons-learned or conditions that are unique to the facility (e.g., specific risk associated with the facility operations).

Scenarios should also be adequately descriptive and, optimally, contain a visual representation of the spill location and extent of the simulated spill. The complexity of the exercise should be scaled to the facility size and type and the agreed upon scenario. The scope of the scenario may address a spill of any size, up to and including the full RPS volume.

It is important for the exercise planning team not to prematurely focus on scenario development. The scenario purpose is to facilitate evaluation of an ODPCP holder's capability to meet exercise objectives.

The exercise planning team should refrain from developing the scenario until after the exercise scope and objectives have been developed.

In summary, consider the following key elements in scenario development:

- The scenario, including the spill source and volume, should be scaled to facilitate the evaluation of the exercise objectives.
- Visual renditions of the simulated spill scenario are useful for exercise conduct initiation.
- Scenarios should include spill locations, estimated volumes, and a qualitative description of the simulated spill along with any technical details such as detailed facility diagrams.
- Description of the source if source control is an exercise objective.
- Use actual conditions of the day unless achieving a particular objective requires a specific simulated condition.
- Vary scenarios from exercise to exercise, incorporate past lessons learned, and address situations specific to the facility.
- The full scenario should not be shared with exercise players; however, exercise players should be provided:
  - An appropriate description of the spill itself to start the exercise (can be depicted visually).
  - Any actions that may have occurred up to the point of the start of the exercise, such as spill discovery and any source control actions.

An exercise planning team should consider the Dos and Don'ts provided in Figure 4 when designing an exercise scenario:

Dos

Do strive for realism. Consider the use of real-time weather conditions to demonstrate the response team's capability to adjust operations to the conditions of the day.

Do refer to the approved ODPCP scenarios and strategies. The RPS scenario isn't the only scenario or strategy that may be exercised. There may be a new process, procedure, or staffing level that needs to be demonstrated.

Do combine IMT and field exercises, where possible. Simultaneous IMT and field deployment in an exercise provides an opportunity to exercise response equipment, personnel, and communications. Deficient communication is the most reported exercise lesson learned. The inclusion of a field response component will also facilitate real time input needed to drive an IMT exercise.

Don'ts

Don't get hung up on the cause of the spill. Responders need to respond to the information that they know at the time of the event. Unless source control is an objective the cause of the spill is not important. A scenario may only state that there is a breach in a tank and a specific estimated volume of product has been released.

Don't use natural disaster scenarios. While Alaska is very seismically active, large seismic events are rare and have a much larger scope of response than an oil spill. It is likely that the oil spill resulting from this event would be low priority for both the plan holder and response agencies.

Don't use a truck rollover scenario. While truck rollovers can result in significant spill events, tanker trucks are not regulated and may not demonstrate adequate execution of plan contents.

Figure 4 Exercise Scenarios Dos and Don'ts

Exercise Documentation

Comprehensive, organized exercise documentation is critical to ensure that an accurate account of the exercise is preserved. Organizations, including ADEC, are able to leverage past documentation to support future exercises and, more importantly, ensures that all critical issues, lessons learned, and corrective actions are appropriately captured to support improvement efforts. The documents identified within Table 16 are further detailed in the following sections.

Table 16: Exercise Design and Development Documents, Exercise Method, and Relevant User

Document*	Exercise Method	Relevant User
Exercise Plan	Drill, Functional, Full-Scale	Players and Observers
Controller and Evaluator Handbook	Drill (Optional), Functional, Full-Scale	Controllers and Evaluators
Master Scenario Events List	Functional, Full-Scale	Controllers, Evaluators and Simulators
Exercise Evaluation Guides	Drill, Functional, Full-Scale	Evaluators, Improvement Planners
Participant Feedback Form	All Exercises	All Participants
Self-Certification Form	Noncrude Tank Vessels or Barges Initial Response Action Exercises	Evaluators, Improvement Planners

*Document complexity and substance should be sized to align with the scope of the exercise.

Exercise Plan

The Exercise Plan provides general information about the exercise to all exercise participants. Since it is intended for all participants including exercise players, it does not contain the full scenario information that may reduce the realism of the exercise. Players should review all elements of the Exercise Plan prior to participation.

An Exercise Plan typically contains the following sections, as applicable:

- Exercise scope and objectives
- Participant roles and responsibilities
- Rules of conduct
- Safety issues
- Logistics
- Security of and access to the exercise sites
- Communications
- Contact procedure for SimCell and Ground Truth (see glossary)

Controller and Evaluator Handbook

The Controller and Evaluator Handbook describes the roles and responsibilities of controllers and evaluators and the procedures they should follow, how exercise controllers communicate and coordinate with one another, and how they track exercise information. It may supplement the Exercise Plan or be a standalone document and typically contains the following information:

- Assignments, roles and responsibilities of group or individual controllers and evaluators
- Detailed master scenario information (A MSEL may be used in complex exercises)
- Ground Truth document, detailing key elements of the exercise scenario MSEL, including injects and simulated events for each controller and evaluator
- Controller communications plan (e.g., a phone list, instructions for the use of radio channels)
- Evaluation instructions
- Evaluation Guide for each exercise objective)
- Exercise control structure
- Maps and directions

Preparation of the Master Scenario Events List

A MSEL may be developed in the design phase to facilitate exercise play or to coordinate more complex exercises. The MSEL contains a chronological list of scripted events to generate activity or action to drive exercise play in support of the objectives.

In general, MSEL development for an oil spill response exercise considers the master scenario and exercise objectives, simulated or actual events that are projected to occur in chronological order, a timeline of anticipated player actions, and identification of injects or simulations associated with the objective. Each MSEL 'event' entry (inject or simulation) should provide the following within the context of the scenario timeline:

- Designated scenario time for inject or simulation
- Event type
- Inject mode
- From (Non-playing entity delivered by the Control Staff)
- To (Intended player)
- Message
- Expected player response
- Associated objective and critical task to be addressed
- Notes Section (for controllers and evaluators to track actual events against those listed in the MSEL, with special instructions for individual controllers and evaluators).

Scenario timelines listed in a MSEL should be as realistic as possible. If the activity occurs sooner than the MSEL writers anticipated, then controllers and evaluators should note the time it occurred, but play should not be interrupted.

Simulators delivering MSEL injects will either be co-located with players in the venue of play, or they will be located in a SimCell. A SimCell is a location from which simulators deliver messages representing actions, activities, and conversations of an individual, agency, or organization that is not participating in the exercise but would likely be actively involved during a real incident. For example, a MSEL event may include an inject event to have controllers act as media or private citizens, driving the objective for players to establish a Joint Information Center (JIC) and produce a unified and consistent message. Prior to the start of the exercise, the methods for introducing injects into exercise play should be tested to ensure that controllers are familiar with the procedures for delivering MSEL injects and that systems that will be used to deliver them are working properly.

The three types of descriptive MSEL events that support exercise play include:

Contextual injects are introduced to a player to help build the exercise operating environment and keep exercise play moving.

Expected action events reserve a place in the MSEL timeline and notify controllers when a response action would typically take place.

Contingency injects are provided by a controller or simulator to players to ensure exercise play moves forward to adequately evaluate performance of activities and meet exercise objectives.

Exercise Evaluation Guides

EEGs are intended to help evaluators collect relevant exercise observations. Each EEG provides evaluators with information on what they should expect to see demonstrated or hear discussed. For more information, reference the Evaluation section EEG Development discussion within this Manual and the example EEG template provided in Appendix C.

Participant Feedback Form

At the end of an exercise, all participants should receive a participant feedback form that requests comment regarding various elements of the exercise. A participant feedback form is commonly used to assess exercise strengths and areas for improvement that participants may have identified. An example participant feedback form that may be augmented for a specific exercise is provided in Appendix D.

Self-Certification Form for Initial Response Action Exercises for Noncrude Tank Vessel or Barge with a Streamlined Plan

The plan holder will assign personnel responsible for completing and maintaining the self-certification form provided by ADEC for each onboard initial response action exercise conducted. The self-certification form is available on the ADEC website forms and applications page: https://dec.alaska.gov/spar/ppr/regulations-guidance/forms-applications/.

DEVELOPMENT PHASE

The exercise development phase involves preparing and planning for exercise conduct including the control, logistics, equipment, and materials needed. It also involves any training steps needed to prepare exercise evaluators and controllers.

Planning for Exercise Logistics

The ODPCP holder plans and provides most of the logistical support necessary to conduct an exercise, such as preparing paperwork, planning for site access, preparing the incident command post, planning for participant transportation (as needed), and setting up for exercise control.

The level of logistical support that is needed for exercise conduct is dependent upon the scope and scale of the exercise. For example, a facility or room needed to conduct IMT or Full-Scale Exercises needs to be sufficient to support the number of anticipated exercise participants, along with needed audio or video equipment, communication equipment for participants, supplies, food or refreshments. Required security badging or identification must be addressed well in advance of the exercise to ensure that this requirement will not hinder exercise conduct. Where applicable, transport and staging must also be planned for all participants. The ADEC exercise planner participates in some exercise development tasks, being responsible for coordination and preparation of ADEC exercise participants.

A summary of ADEC Specific Development Phase tasks for ODPCP holder led exercises include:

- Provide ODPCP holder with ADEC participant names
- Determine and facilitate logistics for ADEC participants (e.g., evaluator communications procedures, equipment needs such as radios, travel arrangements, participant lodging)
- Ensure facility or site access and badging for participants as necessary
- Ensure pre-exercise training, if warranted
- Conduct pre-exercise briefing for all ADEC participants regarding ADEC expectations
- Provide participant packets
- Identify and communicate safety concerns or needs (e.g., PPE, emergency procedures)

Planning for Exercise Control

As described in more detail under the Conducting the Exercise section below, exercise control maintains the pace and direction of the exercise scenario.

To provide for continuity and efficiency in the exercise conduct and evaluation, the exercise planning team members should also serve as both controllers and evaluators. If these are the same individuals as the planning team members, there will be significantly less need to develop and provide special training for controllers or evaluators.

It is recommended that the control team makeup includes one representative each from the ODPCP holder, ADEC, and EPA or USCG. The Planning Team Leader typically serves as the Lead Controller coordinating the scenario progression. Key elements of exercise control include controller safety and security, staffing, structure, training, and communications.

In exercise control, the use of a SimCell may be useful to deliver injects to players, receive player responses or inquiries, and provide other simulations as necessary to ensure alignment with the scenario and facilitate player opportunity to meet the objectives. Physically, a SimCell is a working location from which controllers can monitor play and deliver injects and simulations in a realistic manner. Depending on the exercise method and scale, a SimCell may require a means of communication (e.g., a telephone, computer, e-mail account, radio). In exercise control the use of a Ground Truth document comprised of the detailed elements of a scenario that must remain consistent during exercise conduct to ensure that realism is maintained, and exercise objectives can be achieved along with a Ground Truth Advisor may be useful.

For additional information on exercise control and developing a control structure that facilitates communication and coordination during the exercise, please refer to page 3-21 of HSEEP.

Planning for Exercise Evaluation

The exercise evaluation is dependent upon thorough planning and organization prior to an exercise. As described under the Design section above, the exercise planning team identifies exercise objectives and evaluation elements early in the exercise design process. And, as noted previously, there are significant benefits realized in the exercise conduct and evaluation when the planning team members also serve in controller and evaluator roles.

During the exercise development phase, the evaluation team develops a comprehensive organizational approach and plan to support exercise evaluation (e.g., logistics, tools, and resources to conduct and evaluate the exercise). Additional discussion and information for coordinating evaluation planning can be found in the *Evaluation* section of this Manual.

CONDUCTING THE EXERCISE

Exercise conduct phase includes:

- Briefing participants
- Initiating the exercise
- Controlling the exercise, ensuring it remains within the exercise design and progresses in a manner to assess exercise objectives
- Evaluating the exercise against the objectives and ODPCP commitments
- Conclusion of the exercise including wrap up activities

Briefing Participants

All exercise participants require an exercise briefing prior to the start of exercise play. Prepared participant packets or handouts, as applicable to the scope of the exercise, are useful to support and inform exercise participants. The Planning Team Leader provides the exercise briefing just prior to the start of the exercise.

Provisions must be made for briefing participants at the same time if multiple locations are involved in an exercise as in a combined IMT and field exercise. In these situations, controllers assigned to these locations may ensure all participants are properly informed. The exercise ground rules for

exercise play must be clearly communicated and all participants should be instructed to clarify and preface all in-play exercise communications with written or verbal **this is a drill**.

At a minimum, the following topics should be addressed in an exercise briefing:

- Safety and security considerations for the exercise
- Ground rules for exercise play
- Roles and responsibilities of players
- Participating organizations and their roles
- Exercise communications and contact information

Additional briefings may be conducted for participants in advance of the exercise depending on participant needs and the scope of the exercise.

Starting Exercise Play

After the exercise briefing, the Planning Team Leader starts exercise play in a realistic manner, detailing the simulated spill, which should be pre-scripted as part of the scenario in advance of the exercise. Dependent upon the exercise method, and its scale and scope, exercise play may be started by means of a written (e.g., a player in the field is handed an inject) or verbal communication (e.g., Full-Scale Exercise) or by a phone call (e.g., call out Drill).

Exercise Control

The purpose of exercise control, also referred to as SimCell, is to maintain the pace and direction of the exercise scenario. Exercise controllers within SimCell provide updated information on the simulated spill, making different demands on the players being exercised. Injects are most often used as a means to present a situation for players to address an objective. A Ground Truth document and Ground Truth Advisor may be used during exercise conduct to ensure that elements of the scenario remain consistent, and objectives can be achieved.

The SimCell component should be scaled to meet the needs of the exercise. A large SimCell component may not always be needed. For exercises such as Drills, little or no exercise control may be needed. However, complex Functional or Full-Scale Exercise play may benefit from the use of robust SimCell support because of the amount of simulated activity that may occur.

It is important that simulations and injects are developed in sufficient quantity and scope to drive and shape the exercise scenario, ultimately providing opportunity for the objectives to be met. To ensure the exercise does not stall or deviate from the scenario design parameters, the Lead Controller and supporting controllers should gauge the flow of exercise information and injects to the exercise players and the activities of the IMT. This also serves to keep players engaged and provide the ability to troubleshoot problems that may arise.

The exercise control structure will describe how exercise controllers communicate and coordinate with one another and how controllers track exercise information. These procedures, as well as clearly defined roles and responsibilities for each controller, should be detailed in the Control and Evaluation Handbook.

Evaluation of the Exercise

During the exercise, each evaluator uses the EEGs prepared during the initial planning phases of the exercise to record both quantitative and qualitative data. The EEGs are developed to evaluate the critical tasks needed to achieve the exercise objectives. Ideally, the use of SMART objectives that are specific, measurable, achievable, relevant, and time-bound will be useful in the evaluation. Reference Table 14 and Appendix B and C for additional resources.

Exercise players may inform an exercise evaluation and identify areas for improvement through their observations and comment. State exercise evaluators, including the state exercise players, are specifically requested to provide evaluation on the effectiveness of an action taken to meet an objective. Reference the Exercise Evaluation section within this Manual for more information.

Concluding Exercise

The optimal time for an exercise to end is when the Lead Controller and supporting exercise controllers and evaluators determine that exercise players have been provided sufficient opportunity to meet the exercise objectives. All participants should be informed of the conclusion of the exercise as timely and efficiently as possible.

Player Hot Wash

A Hot Wash provides an opportunity for exercise participants to discuss exercise strengths and areas for improvement immediately following the conclusion of the exercise. It is important that the Hot Wash is conducted by an experienced facilitator to ensure the session is focused and constructive and remains brief. The information gathered during the Hot Wash may be used to inform the AAR and ADEC's Exercise Letter, which is discussed in the Exercise Evaluation Section of this Manual.

Debriefings

Immediately following the exercise, a short debriefing should be conducted with exercise planning team members, evaluators, and controllers to find out their level of satisfaction with the exercise and discuss any issues or concerns, and areas for improvement. Notes from the debrief should be compiled by the Lead Controller and distributed to the evaluation team members.

EXERCISE EVALUATION

Evaluating the exercise successfully is as equally important as conducting it successfully.

The evaluation phase of the exercise cycle involves:

- Planning for exercise evaluation
- Observing the exercise
- Collecting exercise data during and shortly after exercise conduct
- Analyzing collected data to identify strengths and areas for improvement
- Preparation of the ODPCP holder AAR that incorporates input and consensus from participating agencies
- Preparation of the ADEC Exercise Letter

Evaluation of an oil spill response exercise, including a 485 exercise, is the critical link between the exercise and continuous improvement. For all participating organizations, the exercise method, scale, and scope should be considered when designating evaluators. Whenever possible, evaluators and note takers should have experience and subject-matter expertise in their assigned functional area.

ADEC's role in exercise evaluation is focused on assuring the ODPCP is adequate in content and that the ODPCP holder can carry it out effectively. These priorities should be defined and communicated to the ODPCP holder, and incorporated into the exercise in the design and development phase.

Evaluation Planning

It is important that evaluation planning begins during the initial planning phases of the exercise as described in the Exercise Design and Development Section. Identifying clear evaluation requirements early in the planning process will ensure that the design, development, and conduct phases lead to an effective exercise evaluation, and ultimately support the improvement planning phase.

Exercise evaluation planning typically includes:

- Select evaluators and determine evaluation team requirements
- Review and finalize EEGs, which include critical tasks and objectives
- Recruit, train, and assign evaluators
- Develop and finalize evaluation documentation
- Conduct a pre-exercise evaluator and controller briefing

Evaluation Team

In the initial phases of the exercise planning process, the Planning Team Leader should appoint a Lead Evaluator to oversee all facets of the evaluation process. The Lead Evaluator participates fully as a member of the exercise planning team and should be familiar with the exercise objectives.

The exercise planning team and Lead Evaluator should determine the structure of the exercise evaluation team based on the scope of the exercise and the exercise objectives and critical tasks that will be evaluated during the exercise. The size of the evaluation team is scaled to the exercise needs. For example, a Drill, as described in Exercise Methods Section, with a limited scope may have a Lead Evaluator and possibly, one additional evaluator if needed.

The makeup of the evaluator team should mirror that of the planning team, which generally consists of one representative each from the ODPCP holder, ADEC, and EPA or the USCG. RCACs may also participate in the evaluation team. Additional evaluators, including any subject matter experts, may be added to the evaluation team based on the scope and objectives of the exercise. **It is highly recommended that members of the exercise planning team serve as evaluators during exercise conduct. If the evaluators can be the same individuals as planning team members, there will be significantly less need to develop and provide special training for them and the entire exercise process will run more seamlessly.**

Ideally, the ADEC ODPCP reviewer serves as the ADEC exercise planner and the lead ADEC evaluator (reference State Staff Roles and Responsibilities section). In these roles, the ADEC representative can efficiently address the evaluator planning tasks, which include:

- Ensure EEGs sufficiently address evaluation of ADEC 485 objectives
- Identify ADEC evaluator needs
- Provide the ODPCP holder with a list of ADEC evaluator names
- Provide pre-exercise evaluator meeting for evaluators on ADEC expectations
- Provide pre-exercise evaluator meeting for state evaluators to ensure clarity on expectations and that state staff are prepared
- Ensure ADEC evaluators are provided the evaluation packet

The exercise planning team should determine the tools and documentation needed to support the evaluation team.

EEG Development

EEGs provide a consistent tool to guide exercise observation and data collection. EEGs are aligned to exercise objectives and list the relevant player critical tasks to meet the objectives. EEGs should be developed to record such things as timeliness, quantity, quality, and effectiveness of player actions to meet established objectives.

EEGs provide the evaluator with the critical information needed to effectively evaluate the exercise conduct and are designed to accomplish several goals, including:

- Streamline data collection
- Enable assessment of the player action to meet pre-established objectives
- Support development of AARs, ADEC Exercise Letters, and other improvement planning tools
- The exercise planning team should develop an EEG for each exercise objective

No matter the size of an exercise, an effective EEG should identify the:

- Exercise objective being exercised
- The critical tasks that the evaluator should observe and use to evaluate each objective
- The ODPCP section, policy, or procedure upon which the objective is based

Assign and Train Evaluators

The planning team defines the evaluation team needs, including: the number, subject matter expertise, evaluator assignments, and the type of training or instruction that is needed. Evaluator assignments should be communicated to the evaluators in sufficient advance of the exercise. Additional evaluators may be added based on the exercise scope and need. As previously noted, efficiencies may be realized for the exercise if the planning team members also serve as evaluators.

Effective evaluator training ensures that exercise evaluators have a shared understanding of the key data that needs to be collected and how that data will contribute to the evaluation of the exercise. Evaluator training typically includes the following:

- General information about the exercise, including scope, objectives, scenario, and schedule
- Relevant evaluator documentation (e.g., Controller and Evaluator Handbook, and EEGs)
- Specific ODPCP policies, procedures, agreements, or other information that are the focus of the exercise

Preparing for Evaluation Documentation

Once the exercise scope, objectives and scenario have been defined and evaluation planning completed, the Planning Team Leader and Lead Evaluator should finalize the evaluation section of the Controller and Evaluator Handbook or develop an exercise-specific Evaluation Plan.

These documents typically contain the following information:

- Exercise-Specific Details: Exercise scenario or MSEL, schedule of events, and evaluation schedule
- Evaluator Team Organization, Assignments, and Locations: A list of evaluator locations, shift assignments, EEGs, a map of the exercise sites, evaluation team organizational chart, and evaluation team contact information
- Evaluator Instructions: Detailed instructions for evaluators for activities before, during, and following the exercise

For smaller facilities or in less complex exercises, the Controller and Evaluation Handbook may be a brief, simple document. For more complex exercises, it will be a longer document, containing all the information and tools that evaluators require.

Pre-Exercise Evaluator Briefing

Before exercise play begins, the Lead Evaluator should meet with all evaluators to review and verify roles, responsibilities, and assignments, and to provide any significant updates (e.g., last-minute changes to the scenario, new assignments). The evaluator briefing provides an opportunity for all evaluators to ask questions and to ensure complete understanding of their roles and responsibilities.

Depending on a variety of factors, including exercise scope, objectives, and scenario, this briefing may be done in conjunction with exercise controllers, i.e., a joint controller and evaluator briefing. Depending on the exercise organization, provisions must be made to conduct briefings at each exercise site. As needed, the Lead ADEC evaluator may conduct its own briefing for ADEC evaluators on ADEC expectations.

Data Collection

Evaluation and evaluation data is to be focused on actions to meet the exercise objectives.

The primary sources of information for the evaluation include:

- Recorded evaluator observations on ODPCP holder efforts to meet the objectives
- Exercise documentation generated during exercise play [i.e., specific Incident Command System (ICS) forms, Incident Action Plans, photos (both field and IMT), etc.]
- Feedback received from the participant Hot Wash
- Participant feedback forms
- Additional de-briefings collected and used in the final analyses of the exercise

Logistical practicalities may necessitate the need for each functional group or command post for the exercise (e.g., field teams, incident command posts) to hold their own Hot Wash and debriefings, including filling out participant feedback forms. Outcomes can be consolidated at a combined debriefing with representatives from each group or center present. The evaluation team should retain notes and records of the exercise to support the development and findings in the final exercise AAR and the ADEC Exercise Letter.

Evaluators may collect supplemental data during or immediately after the exercise, which may be used to fill in gaps or address concerns identified during the exercise conduct and evaluation. Useful evaluation data might include: completed ICS forms; duty logs and message forms; partial or completed incident action plans; personnel training records or logs; or response equipment maintenance records.

Exercise Data Analysis

An analysis of the exercise conduct and effectiveness of the ODPCP holder's ability to meet the exercise objectives should provide for both demonstrated strengths and identify areas for improvement (i.e., what went right, what went wrong).

The evaluation team consolidates data collected during the exercise and determines whether players performed critical tasks and effectively met the exercise objectives. The evaluation team also takes notes on the course of exercise play, demonstrated strengths, and areas for improvement.

During the data analysis, it is important that evaluators review each critical task not completed as expected and each objective not met, with the aim of identifying a root cause. A root cause is the source of, or underlying reason behind, an identified issue toward which the evaluator can direct an improvement. When conducting a root-cause analysis, the evaluator should attempt to trace the origin of an exercise event back to earlier events and their respective causes. Root-cause analysis may also require the review and evaluation of the ODPCP.

When completing the analysis, evaluators should consider the following questions:

- Were the objectives met? If the objectives were not met, what factors contributed to this result?
- Did discussion or activities suggest the critical tasks were executed to effectively meet the objectives? If not, what was the impact or consequence?
- Does the current ODPCP support critical tasks and objectives? Were players familiar with the ODPCP and related documents?

Analyzing events in this sequence will help evaluators determine the underlying cause of issues and inform ADEC and the ODPCP holder of improvement plans and corrective actions to address the concern.

IMPROVEMENT PLANNING

After the evaluation phase concludes, the improvement planning process begins. During the improvement planning phase, exercise findings reports, including the AAR and the ADEC Exercise Letter, are compiled and issued. These reports detail observations, corrective actions, and recommendations to address improved oil spill response preparedness. To ensure effective preparedness improvement, as well as ODPCP compliance, corrective actions identified during individual exercise are to be tracked to completion.

Corrective Actions

HSEEP defines corrective actions as concrete, actionable steps intended to resolve oil spill preparedness gaps and shortcomings that are identified in the exercise.

Once exercise data are analyzed, organizations (e.g., ODPCP holder, ADEC, federal agencies) perform an additional qualitative assessment to identify potential corrective actions. HSEEP provides a simple list of questions that, when applied to oil spill response exercises, offer organizations a guide for discussion of potential corrective action development:

- What changes need to be made to plans and procedures to improve performance?
- What changes need to be made to organizational structures to improve performance?
- What changes need to be made to management processes to improve performance?
- What changes to equipment or resources are needed to improve performance?
- What training is needed to improve performance?
- What are the lessons learned for approaching similar problems in the future?

After Action Report

The AAR should provide an overview of the exercise (e.g., scope, objectives, method, participants, relevant documentation or photographs, and the scenario) and include outcomes from the evaluation process.

The main focus of an AAR is the analysis of exercise objectives while highlighting strengths and areas for improvement. Evaluators should review their notes and documentation to identify the strengths and areas for improvement relevant to the ODPCP holder's ability to meet exercise objectives.

Once all corrective actions have been consolidated, they may be incorporated into the AAR. Corrective actions are tracked to completion to ensure tangible oil spill preparedness improvement results. Development and input into the AAR is a collaborative process between the participating organizations. This includes ADEC representation input and consensus with the exercise summary and findings. Improvement planning team consensus on the AAR findings, corrective actions, and improvement planning serves to preclude unnecessary conflict.

As part of improvement planning, ODPCP holders are expected to employ an effective corrective action process. HSEEP, PREP, and ADEC's Oil Spill Response Exercise Manual recognize that the use of such a process serves to address and track corrective actions, monitor progress to improve preparedness, and facilitate compliance.

ADEC Exercise Letter

As a part of Alaska's oil spill preparedness and response community, ADEC's mission is to ensure and oil spill response preparedness and capability. Within the scope of a 485 exercise, ADEC may have both positive exercise observations and those that identify areas for improvement. Ultimately, ADEC is responsible to provide oversight of a regulated facility's oil spill response preparedness and their legal obligations.

ADEC's Exercise Letter serves as a tool that the ODPCP reviewer uses to communicate a broad range of observations, findings, and corrective actions that may be identified during the exercise. Just as in the AAR, the main focus of the ADEC Exercise Letter is the analysis of exercise objective achievement and the completeness of the ODPCP itself. The ADEC ODPCP reviewer may use the AAR to facilitate parts of the ADEC Exercise Letter, but it is not required.

At a minimum, the ADEC Exercise Letter should provide the following information:

- An exercise overview to address, as applicable, ODPCP holder name, facility type, scope, objectives, method, relevant documentation or photographs, scenario, and ADEC contact person
- Whether the exercise counts as a 485 exercise
- Outcomes from the evaluation process (findings and observations)
- Areas for improvement and corrective action needs, if applicable

In addition to ADEC evaluator input, state player observations will be used to inform ADEC's Exercise Letter, including findings, observations, and necessary corrective actions. ADEC may identify any number of recommendations and corrective actions to address improvement planning needs, such as a training audit, a targeted exercise, ODPCP amendment, or other improvement or corrective steps to ensure the ODPCP is adequate and the ODPCP holder is capable of effectively implementing their planned strategies and tactics in an emergency situation. The ADEC ODPCP reviewer could also require that the ODPCP holder submit a corrective action plan within a certain timeframe to address a particular concern.

The ADEC ODPCP reviewer will track the corrective actions identified in the ADEC Exercise letter to completion, ensuring that the exercise yields tangible oil spill response preparedness improvements, the ODPCP is complete, and the ODPCP holder is capable of adequately executing the ODPCP.

ADEC Exercise Lessons Learned Initiative

For exercises that ADEC participates in, ADEC conducts an internal debriefing for state exercise participants. The purpose of the debriefings is to evaluate the exercise and identify lessons learned (for both ADEC and the ODPCP holder) as part of ADEC's improvement planning process.

The intent in capturing and sharing lessons learned is to increase the value of exercises for ADEC and ODPCP holders, to share knowledge, and to identify gaps and innovations to promote continual improvement in oil spill response preparedness and response capability.

Back Matter

Glossary of Terms

Term	Description
485 Exercise	The term (or phrase) 485 exercise refers to a discharge exercise that ADEC conducts to ensure the content of an ODPCP is adequate and that the ODPCP holder can adequately execute the ODPCP. ADEC requires one 485 exercise during every 5-year period for each ODPCP holder. ADEC may conduct no more than one additional 485 exercises per year on each ODPCP holder; although, failure of the ODPCP holder to demonstrate adequacy of their plan and its execution may lead to additional 485 exercises. The 485 exercise is distinct from a regular training exercise that an ODPCP holder may hold for plan familiarization or response skills training purposes. However, an ODPCP holder may convert a regular training exercise into a 485 exercise by meeting certain criteria, including scheduling the exercise with ADEC and involving ADEC in exercise design and development, exercise conduct, exercise evaluation, and continued improvement. Within the Manual, reference to a 485 exercise is a discharge exercise conducted by ADEC to meet provisions of 18 AAC 75.485 and 18 AAC 75.565. For noncrude tank vessels or barges, a 485 exercise means an onboard initial response action exercise that specifically demonstrates the vessel personnel familiarity with onboard response equipment and their ability to effectively implement initial response actions. As with other 485 exercises, ADEC may call not more than one additional exercise per year.
Controller	In operations-based exercises, a Controller manages exercise play, directs the pace of exercise play, and ensures key exercise data is provided to players. The Controller may prompt or initiate certain player actions and injects to the players as described in the MSEL, ensuring exercise continuity. The Controller monitors the exercise scenario timeline and directs input on the scenario to players.
Critical Task	ADEC defines critical task as a distinct element required to perform or meet an objective. Critical tasks generally include the activities, resources, and responsibilities required to effectively fulfill an objective. Objectives and critical tasks are based on the ODPCP and any supporting documents (e.g., the RCP and applicable ACP) to be validated and exercised during the exercise.
Evaluator	Evaluators passively assess and document player performance against established emergency plans (such as the ODPCP) and exercise evaluation criteria without interfering with exercise flow. Evaluators will use EEGs to measure and assess performance and capture unresolved issues.
Ground Truth	A document comprised of the detailed elements of a scenario that must remain consistent during exercise development and conduct to ensure that realism is maintained, and objectives can be achieved.
Ground Truth Advisor	An individual responsible for ensuring that the scenario details remain consistent during exercise conduct.
Inject	Injects may be spoken or written information, inserted into an exercise and designed to generate player response. Injects may be associated with a specific exercise objective – providing the exercise player an opportunity to address a specific objective.
MSEL	The MSEL is an outline or chronological timeline of expected actions and events that are injected into exercise play by controllers to generate or stimulate player activity. The MSEL

	may be used to trigger necessary events so that specific objectives are met. The MSEL links a simulated activity to an exercise action, enhances exercise experience for players, and reflects an incident or activity meant to prompt players to action.
Objective	Distinct goal or outcome to be achieved during an exercise. Each objective for a 485 exercise is based upon an ODPCP component. Objectives are typically written using quantitative and qualitative statements (i.e., numbers, timeliness, and effectiveness). Objectives should be written using the SMART protocols described in Table 14 of the *ADEC Oil Spill Response Exercise Manual*.
Oversee or Oversight	In a 485 exercise, state staff players participate in virtually the same manner as they will participate in an actual oil spill response. Consistent with the AIMS Guide and state's response policy described in the RCP Part 2, Section B.2, pg. 21, the state's role in regulated facility exercises is defined as oversight. Consistent with the description in the AIMS Guide and the RCP, state staff participate in **oversight** of the responsible party's (RP) response exercise by setting joint objectives, approving incident action plans, monitoring overall response actions, and reviewing and approving permits. The RCP expands upon this aspect of the state's responsibilities in this role i.e., conduct oversight functions concerning monitoring, investigations, permitting, damage assessments, restoration, and documentation for possible litigation or cost recovery.
Participant	Includes all roles in an oil spill response exercise, e.g., players, controllers, planners, evaluators, etc.
Player	Players have an active role in the oil spill response scenario performing their regular roles and responsibilities. Players initiate actions that will respond to and mitigate the simulated emergency. For further discussion on the role of state agency players, please reference the State Staff Roles and Responsibilities Section.
Root Cause Analysis	When evaluating exercises, root-cause analysis is a method used to trace the origin of an event back to earlier events and their respective causes. Root-cause analysis enables exercise stakeholders to target how best to address areas for improvement and close capability gaps.
Scenario	Exercise storyline scripted to provide opportunities for exercise players to respond to situations, demonstrating the ability to meet a specific exercise objective. It is inclusive of the situations presented from simulations and inject components of the MSEL. An oil spill response scenario is specific to a facility's ODPCP risks, including a spill scenario volume up to, or equal to, the calculated response planning standard volume.
Scale	The size of the exercise is indicative of the numbers of players and amount of resources that will be utilized during play.
Scope	The scope of an exercise is an indication of the breadth, depth or reach. Considerations on defining the exercise scope include: the exercise objective, the exercise method; level of participation; exercise duration, date, location, agency input or focus, and exercise parameters.
SimCell	In exercise control, a SimCell is used to deliver injects, receive player responses, and provide other simulations as applicable. Physically, a SimCell is a working location where a number of qualified controllers are staged to deliver timely injects and simulations. Depending on the method of exercise, the SimCell may require a telephone, computer, e-mail account, radio, or other means of communication.
Simulation	For the purposes of the master exercise scenario, the players are provided with a plausible spill incident description to initiate play and exercise conduct. Throughout the exercise conduct phase, additional events may be simulated and communicated by exercise controllers (in the SimCell), for the purpose of triggering player response or action.

ACRONYMS AND ABBREVIATIONS

Acronym	Description
AAC	Alaska Administrative Code
AAR	After Action Report
ACP	Area Contingency Plan
ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resources
AIMS	Alaska Incident Management System Guide
AS	Alaska Statute
BSEE	Bureau of Safety and Environmental Enforcement
DHS	Department of Homeland Security
EEG	Exercise Evaluation Guide
EPA	Environmental Protection Agency
EU	Environmental Unit
FEMA	Federal Emergency Management Agency
FOSC	Federal On-Scene Coordinator
FRP	Facility Response Plan
GIUE	Government Initiated Unannounced Exercise
GT	Ground Truth
HSEEP	Homeland Security Exercise and Evaluation Program
ICS	Incident Command System
IMT	Incident Management Team
IOGP	International Association of Oil & Gas Producers
IPIECA	International Petroleum Industry Environmental Conservation Association
IPM	Initial Planning Meeting
JIC	Joint Information Center
LO	Liaison Officer
Manual	Oil Spill Response Exercise Manual
MSEL	Master Scenario Events List
NTV	Nontank Vessels
ODPCP	Oil Discharge Prevention and Contingency Plan
OPA 90	Oil Pollution Act of 1990
OSRP	Oil Spill Response Plan
PHMSA	Pipeline and Hazardous Materials Safety and Hazardous Materials Safety Administration
PREP	National Preparedness for Response Exercise Program Guidelines
QI	Qualified Individual
RCAC	Regional Citizens Advisory Council
RCP	Regional Contingency Plan
RP	Responsible Party
RPS	Response Planning Standard
SCP	Subarea Contingency Plan
SimCell	Simulation Cell
SMART	Specific, Measurable, Achievable, Relevant, Time-bound

SOSC	State On-Scene Coordinator
SPCC Plan	Spill Prevention, Control, and Countermeasure Plan
UC	Unified Command
U.S.	United States
USCG	United States Coast Guard

REFERENCES

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Appendices

- A – Exercise Planning Task List
- B – Exercise Objectives and Evaluation Development Guide
- C – Exercise Evaluation Guide
- D – Exercise Participant Feedback Form

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A. Exercise Planning Task List

The simplified tasks* illustrated below provides an overview of the scheduling and associated tasks required for a Full-Scale Exercise, which may be scaled to the facility and the exercise scope.

Design	

Weeks 7-13	• Document preparation
	  ○ Complete development of exercise assumption, evaluation criteria/EEGs, simulation inputs, injects and other supporting documentation
	  ○ Exercise planning team walk-through of the scenario, simulation inputs and injects
	  ○ Obtain commitment from ADEC participants

Weeks 14-18	• For Functional and Full-Scale exercises ○ As applicable to exercise scale and scope, develop Master Scenario Events List (MSEL) or similar script to guide exercise controllers to ensure activity remains within predefined boundaries and that the exercise is driven to accomplish exercise objectives
Weeks 19-21	• Refine objectives and scenario based on the ODPCP • Develop exercise assumptions (i.e., what response actions will be simulated for exercise conduct) • Develop evaluation criteria and EEGs
Weeks 22-23	• Develop scenario ○ Reference the ODPCP, including planning scenarios

Weeks 24-26	• Designate exercise planning team coordinator and team
	  ○ Size of team
	  ○ Allocate individual responsibilities
	• Set general objectives based on the ODPCP
	• Determine Scope
	  ○ Exercise method
	  ○ Size of exercise
	  ○ Involvement of other organizations
	  ○ Physical resources to be mobilized
	• Establish exercise specifics
	  ○ Date
	  ○ Location
	  ○ Duration
	• Obtain management approvals or concurrence

Development	

Weeks 1-3	• Materials
	  ○ Equipment requirements
	  ○ Communications systems
	  ○ Briefing notes and handouts
	• ADEC evaluator meeting
	• ADEC participant meeting
	• Site visit for field components of the exercise

Weeks 4-6	• Logistics
	  ○ Facility/site access
	  ○ Space requirements for exercise facilities
	  ○ Travel

Conduct	
Due day 0	• Brief participants • Initiate exercise • Maintain exercise through injects, simulation, and exercise control processes • Evaluate the exercise conduct • Hotwash • Participant feedback forms

Evaluation	

+2-4 weeks	• Prepare reports
	  ○ Joint agency/ODPCP holder After Action Report
	  ○ ADEC Exercise Letter

+1-4 weeks	• Analyze exercise data to identify strengths and areas for improvement
	  ○ Performance against objectives
	  ○ Identify strengths and areas for improvement
	• Capture lessons learned from ADEC participants

+1-2 days	• Collect additional exercise data
	  ○ Exercise/controller debriefings as applicable
	  ○ ADEC participant debriefing, and lessons learned

Improvement Planning	

+5-8 weeks	• Make recommendations
	  ○ Continual improvement
	  ○ Revisions to ODPCP and procedures
	  ○ Additional training

** Exercise Planning Task List. Adapted from IPIECA-IOGA, 2016, p. 40*

B. Exercise Objectives and Evaluation Development Guide

Consistent with HSEEP methodology, exercise objectives and evaluation criteria for oil spill response exercises should be based upon components of an approved ODPCP. In the context of validating an ODPCP, the ADEC ODPCP reviewer and the ODPCP holder may find the following table a useful resource in planning the facility oil spill response exercise. This information is not intended to restrict or limit the exercise scope or objectives, circumvent or limit ODPCP holder's obligations, or predefine exercise evaluation acceptance criteria. Rather, the information is offered to foster dialog between the ODPCP holder and the ADEC ODPCP reviewer.

This guide provides a *general* framework from which specific ODPCP objectives and evaluation criteria may be selected and further developed. This guide is intended to be used in conjunction with the exercise objective and evaluation processes and SMART protocols described in this Manual and in conjunction with the EEG template provided in Appendix C. Reference Table 14 and Appendix C for additional resources.

Each exercise is specific to the facility and will have its own objectives based upon the exercise priorities, *scope and scenario at any given time.*

Example: the exercise scope may be limited to the initial response actions for the facility. Multiple ODPCP components apply to an initial response action exercise, including: safety, source control, reporting and notification, and containment tactics. Exercise objectives may be identified for all or some of these components based upon the facility and exercise scenario. ADEC's exercise evaluation criteria also considers whether the ODPCP is adequate in content and execution.

ODPCP Component	Exercise Objectives and Evaluation Criteria Considerations
Reporting and Notification 18 AAC 75.449(a)(2)	Exercise evaluation criteria developed to validate the ODPCP holder's capability to implement notification procedures may address: • Internal notifications, ramp up procedures for facility or company personnel, and PRAC activation • Regulatory agency reporting and notification requirements • Notification of potentially affected key stakeholders Evaluators determine whether notifications were made consistent with the ODPCP and whether the ODPCP adequately provides the information to conduct effective notifications.
Safety 18 AAC 75.449(a)(3)	Exercise evaluation criteria developed to validate the ODPCP holder's capability to operate safely during the response may address: • Safety-related immediate response actions • ODPCP Safety Officer duties • Procedure to develop an incident specific safety plan Evaluators determine whether a safety plan was developed and whether the information in the ODPCP adequately provides the necessary information for responders to develop the incident specific safety plan and operate safely during response activities.

ODPCP Component	Exercise Objectives and Evaluation Criteria Considerations
Communications 18 AAC 75.449(a)(4)	Exercise evaluation criteria developed to validate the ODPCP holder's capability to communicate in the field and between field and command may address: • Field communications procedures • Designated radio channels or frequencies and their intended use • Radio communications between IMT, field command, and field units • Procedures to expand the system as needed • Backup systems in place Evaluators determine whether communications were conducted consistent with the ODPCP and whether the information in the ODPCP adequately provides the necessary information for responders to conduct effective communications.
Deployment Strategies 18 AAC 75.449(a)(5)(A)	Exercise evaluation criteria developed to validate the ODPCP holder's capability to implement deployment strategies may address: • Timetable for activation of each of the main pieces of equipment • Logistic Support including transportation of equipment and personnel to the spill site • Alternative methods for transport of resources to the site in adverse weather conditions • Continual assessment of the need for additional equipment and personnel and timely delivery of those resources • Immediate and ongoing response actions that onsite personnel will perform until the PRAC arrives Evaluators determine whether transportation of resources to the spill site are consistent with the ODPCP. The evaluators also consider the adequacy of the logistical support information for resource mobilization, and whether it is practicable.
PRAC Mobilization 18 AAC 75.449(a)(5)(B)	Exercise evaluation criteria developed to validate the ODPCP holder's capability to mobilize their PRAC may address: • Procedures for notifying and mobilizing each contractor • Procedures and timetables for transfer of any response duties to the contractor Evaluators determine whether PRAC mobilization was conducted consistent with the ODPCP and whether the ODPCP adequately provides information to mobilize resources to the spill site.
Procedures to Stop the Discharge 18 AAC 75.449(a)(6)(C)	Exercise evaluation criteria developed to validate the ODPCP holder's capability to stop a discharge and prevent its further spread are based upon: • Source control procedures • Follow up actions taken to stabilize the situation and prevent further release of oil Evaluators determine whether source control was conducted consistent with the ODPCP and if the actions are adequate to stop a discharge and prevent its further spread within the shortest possible time.

ODPCP Component	Exercise Objectives and Evaluation Criteria Considerations
Fire Prevention and Control 18 AAC 75.449(a)(6)(D) 18 AAC 75.449(a)(9)(B)	Exercise evaluation criteria developed to validate the ODPCP holder's capability to implement fire prevention and control procedures, including: • Shutdown of electrical power • Location of fire suppression equipment • Use of intrinsically safe equipment Evaluators determine whether fire prevention and control was conducted consistent with the ODPCP and whether the ODPCP adequately provides the necessary information for responders to prevent and control a fire.
Discharge Tracking and Forecasting of Shoreline Contact 18 AAC 75.449(a)(6)(E)	Exercise evaluation criteria developed to validate the ODPCP holder's ability to track the spill and forecast shoreline contact may address: • Procedures for real-time surveillance and tracking of spilled oil on open water • Equipment and methods used for surveillance and tracking of spilled oil • Procedures to forecast potential shoreline impacts • Potential sources of local information Evaluators determine whether spill surveillance, tracking, and forecasting was conducted consistent with the ODPCP and whether the ODPCP adequately ensures responders have accurate spill location and trajectories.
Protection of Environmentally Sensitive Areas and Areas of Public Concern 18 AAC 75.449(a)(6)(F)	Exercise evaluation criteria developed to validate the ODPCP holder's ability to protect environmentally sensitive areas (ESAs) and areas of public concern (AOPCs) are based upon: • Procedures for prioritizing ESAs and AOPCs • Site specific protection strategies and tactics • Equipment and personnel • Liaison coordination to facilitate local stakeholder concerns Evaluators determine ODPCP holder's ability to protect pre-identified ESAs and AOPCs before oil impact consistent with the ODPCP, whether the ODPCP adequately provides the necessary information for responders to prioritize and protect these sites, and/or the ODPCP holder ability to adjust strategies based upon the spill trajectory.
Containment and Control Strategies 18 AAC 75.449(a)(6)(G)	Exercise evaluation criteria developed to validate the ODPCP holder's capability to contain and control a spill may address: • Appropriate response techniques • Specific boom deployment strategies and tactics • Specific strategies and tactics for land spills • Equipment and personnel requirements for these tactics • Considerations for deployment in differing conditions Evaluators determine whether the ODPCP holder's contained and controlled the spill effectively consistent with the ODPCP and whether the ODPCP adequately provides the necessary information for responders to contain and control the spill effectively.

ODPCP Component	Exercise Objectives and Evaluation Criteria Considerations
Mechanical Recovery Strategies 18 AAC 75.449(a)(6)(H)	Exercise evaluation criteria developed to validate the ODPCP holder's ability to mechanically recover the contained and controlled oil may address: • Recovery strategies and tactics • Equipment and personnel required for these tactics • Deployment timeframes • Equipment used is appropriate for the spilled oil type and pre-established efficiencies • Planned hours of operation Evaluators determine whether the recovery strategies are consistent with the ODPCP and the ODPCP adequately provides the necessary information for responders to effectively recover oil.
Lightering, Transfer, and Storage of Oil from Damaged and Undamaged Tanks 18 AAC 75.449(a)(6)(I)	Exercise evaluation criteria developed to validate the ODPCP holder's capability to lighter oil from damaged tanks or undamaged tanks if the risk of an additional discharge is present and in the shortest time safely achievable may address: • Storage and transfer capacity and procedures • Equipment needed • Compatibility of transfer and storage equipment • Safety measures necessary during transfer Evaluators determine whether transfer and storage of oil was conducted consistent with the ODPCP and whether the ODPCP is adequate for responders to safely and effectively transfer and store oil.
Recovered Oil and Oily Water Transfer and Storage 18 AAC 75.449(a)(6)(J)	Exercise evaluation criteria to validate the ODPCP holder's capability to transfer and store recovered oil and oily water may address: • Procedures for transfer and storage of recovered oil and oily-waste mixture • Integration with oil containment and recovery strategies to ensure continuous recovery operations • Methods for estimating the amount of recovered fluids (may be subject to SOSC approval) • Equipment is sufficient and appropriate for transfer and storage needs Evaluators determine whether recovered oil and oily water transfer and storage was conducted consistent with the ODPCP and whether the ODPCP adequately provides for responders to manage recovered oil and oily water effectively.

ODPCP Component	Exercise Objectives and Evaluation Criteria Considerations
Temporary Storage and Ultimate Disposal for Oily, Sanitary, and Solid Waste 18 AAC 75.449(a)(6)(K)	Exercise evaluation criteria developed to validate the ODPCP holder's ability to store and dispose of waste generated from the spill response may address: • State-approved waste management plan requirement • Expected type and amounts of waste • Identified storage sites and their capacities • Procedures for protecting the environment and controlling contamination from the storage site • Procedures, timetables, and transportation to transfer waste from temporary to permanent storage or disposal • Procedures for permits and authorizations • Equipment and personnel needed • Identification of ultimate disposal options Evaluators determine whether waste was handled consistent with the ODPCP and whether the ODPCP adequately provides the information for responders to effectively store and dispose of waste generated.
Wildlife Protection 18 AAC 75.449(a)(6)(M)	Exercise evaluation criteria developed to validate the ODPCP holder's capability to protect wildlife, including: • Procedures and methods for wildlife protection, recovery, disposal, rehabilitation, and release of affected wildlife • Procedures and methods for minimizing wildlife contamination through hazing or other means • Procedures for permits and authorizations • Equipment and personnel needed Evaluators determine whether wildlife protection was conducted consistent with the ODPCP and whether the ODPCP adequately provides the necessary information for responders to protect wildlife.
Shoreline Cleanup 18 AAC 75.449(a)(6)(N)	Exercise evaluation criteria developed to validate the ODPCP holder's capability to draft and implement an effective shoreline cleanup plan may include: • Preparation of a shoreline cleanup assessment plan for UC approval • Preparation of a shoreline cleanup play (as necessary within the exercise scope) • Identification and activation (simulation or actual) of a shoreline cleanup assessment team • Cleanup and restoration methods and techniques • Equipment and personnel to implement approved cleanup techniques Evaluators determine whether the Shoreline Cleanup Plan was developed consistent with the ODPCP and whether the information adequately supports shoreline cleanup.

ODPCP Component	Exercise Objectives and Evaluation Criteria Considerations
Non Mechanical Response Options 18 AAC 75.451(e)(4)	Exercise evaluation criteria developed to validate the ODPCP holder's capability to implement non mechanical response options, including: • Procedures for obtaining the necessary permits and approvals • Procedures for using non mechanical response options • Equipment and personnel needed • Activation of personnel and equipment as appropriate within the exercise scope • Procedures for protecting ESA's and areas of public concern from adverse effects of the non mechanical response option Evaluators determine whether non mechanical response options were chosen and implemented consistent with the ODPCP and if the ODPCP is adequate for responders to implement these options.

C. Exercise Evaluation Guide

EXERCISE EVALUATION GUIDE TEMPLATE INSTRUCTIONS

Exercise criteria and critical tasks are established for each objective by the exercise planning team. This process is coordinated and completed during the exercise design and development phase. The conduct and evaluation team work to realize completion of the exercise and EEGs.

Terminology

The EEGs are structured to capture information specifically related to the evaluation requirements developed by the exercise planning team. The following evaluation requirements are documented in each EEG:

Evaluation Requirement	Definition
ODPCP response component	The distinct ODPCP component based on ADEC's Response Action Plan components found at 18 AAC 75.449. The Exercise Objectives and Evaluation Criteria Guide contained in the *ADEC Oil Spill Response Exercise Manual* Appendices B and C may provide assistance in scoping an exercise and establishing evaluation criteria based upon an objective.
Objectives	Each objective for a 485 exercise is based upon an ODPCP component. Objectives are typically written using quantitative and qualitative statements (i.e., numbers, timeliness, and effectiveness). Objectives should be written using the SMART protocols described in Table 7 of the *ADEC Oil Spill Response Exercise Manual*. Examples of objectives for operations-based exercise methods are provided in Table 15 of the Manual.
Critical tasks	ADEC defines critical task as the distinct elements required to perform or meet an objective. Critical tasks generally include the activities, resources, and responsibilities required to effectively fulfill an objective. Objectives and critical tasks are based on the ODPCP and any supporting documents (e.g., the RCP and applicable ACP) to be validated and exercised during the exercise.
Objective ratings	The summary description of performance against the critical tasks. Objective ratings describe how exercise players performed relative to an overarching objective.

Documenting Observations

For each EEG, evaluators provide an objective rating and observation notes, including an explanation of the objective rating. To efficiently complete each section of the EEG, evaluators focus their observations on the objectives and critical tasks listed in the EEG.

Observation notes include if and how quantitative or qualitative targets were met. For example, an objective might state, "Within 4 hours of the exercise initiation, effectively protect…." Observation notes on that objective should include the actual time required for exercise players to complete the critical tasks.

Additionally, observations should include:

- How the objective was or was not met
- Whether the action was effective or not
- Relevant decisions made and information gathered to make decisions
- Requests made and how requests were handled
- Resources utilized
- Plans, supporting documents, equipment, procedures, logistics used or implemented
- Any other factors contributed to the results

Evaluators may also note any obvious cause or underlying reason the objective was not met or critical task was not completed.

Assigning Ratings

Based on their observations, evaluators assign an objective rating for each objective on the EEG. The rating scale includes four ratings:

- Performed without Challenge (P)
- Performed with Some Challenges (S)
- Performed with Major Challenges (M)
- Unable to be Performed (U)

Definitions for each of these ratings are included in the EEG.

Wrap-up

At the conclusion of the exercise, submit all completed EEGs and any supporting documentation to the Lead Evaluator. The Lead ADEC Evaluator is to obtain copies of the documentation for consideration in the department's assessment of the exercise.

Exercise Evaluation Guide*

Exercise Name: [Insert exercise name] *Exercise Date:* [Insert exercise date]	*Plan Holder:* [Insert organization or jurisdiction]	*Venue:* [Insert venue name]

ODPCP Exercise Component: [Insert ODPCP exercise component] **Exercise Objective 1:** [Insert customized SMART objective based on the ODPCP] *Critical Task:* [Insert task from ODPCP, policy or procedure] *Critical Task:* [Insert task from ODPCP, policy or procedure] *Critical Task:* [Insert task from ODPCP, policy or procedure] *Critical Task:* [Insert task from ODPCP, policy or procedure] **Source(s):** [Attach copies of ODPCP section, policy, procedure, or reference being evaluated.]
ODPCP Exercise Component: [Insert ODPCP exercise component] **Exercise Objective 2:** [Insert SMART objective based on the ODPCP] *Critical Evaluation Task:* [Insert task from ODPCP, policy or procedure] *Critical Evaluation Task:* [Insert task from ODPCP, policy or procedure] *Critical Evaluation Task:* [Insert task from ODPCP, policy or procedure] *Critical Evaluation Task:* [Insert task from ODPCP, policy or procedure] **Source(s):** [Attach copies of ODPCP section, policy, procedure, or reference being evaluated.]
ODPCP Exercise Component: [Insert ODPCP exercise component] **Exercise Objective 3:** [Insert SMART Objective based on the ODPCP] *Critical Evaluation Task:* [Insert task from ODPCP, policy or procedure] *Critical Evaluation Task:* [Insert task from ODPCP, policy or procedure] *Critical Evaluation Task:* [Insert task from ODPCP, policy or procedure] *Critical Evaluation Task:* [Insert task from ODPCP, policy or procedure] **Source(s):** [Attach copies of ODPCP section, policy, procedure, or reference being evaluated.]

*This EEG template has been adapted for use from the Department of Homeland Security (DHS), Federal Emergency Management Administration's Homeland Security Exercise and Evaluation Program (HSEEP), 2020. An editable version of the template is available at the following webpage: https://dec.alaska.gov/spar/ppr/prevention-preparedness/exercises/

Exercise Objective	Associated Critical Tasks	Observation Notes and Explanation of Rating	Objective Rating
[Insert Exercise Objective 1 from page 1]	[Insert Objective 1 Critical Tasks from page 1]		
[Insert Exercise Objective 2 from page 1]	[Insert Objective 2 Critical Tasks from page 1]		
[Insert Exercise Objective 3 from page 1]	[Insert Objective 3 Critical Tasks from page 1]		

Evaluator Name _____

Evaluator E-mail _____

Phone _____

Ratings Key
P – Performed without Challenges
S – Performed with Some Challenges
M – Performed with Major Challenges
U – Unable to be Performed

RATINGS DEFINITIONS

Performed without Challenges (P)	The critical tasks associated with the objective were completed in a manner that achieved the objective. The activities were conducted in accordance with the ODPCP and supporting documents if any.
Performed with Some Challenges (S)	The critical tasks associated with the objective were completed in a manner that achieved the objective. The activities were conducted in accordance with the ODPCP and supporting documents if any. However, opportunities to enhance effectiveness and/or efficiency were identified.
Performed with Major Challenges (M)	The critical tasks associated with the objective were completed in a manner that achieved the objective. However, the activities were not conducted in accordance with the ODPCP and supporting documents if any. Additionally, opportunities to enhance effectiveness and/or efficiency were identified.
Unable to be Performed (U)	The critical tasks associated with the objective were not performed in a manner that achieved the objective.

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D. Exercise Participant Feedback Form

Name: (optional) _____

Role: _____

As part of a continuous improvement process, all participant feedback is valued and provides input into the exercise process and evaluation. Please comment on the following elements based on your role and experiences during this exercise.

Did you understand your individual role and responsibility?
Comment:
What are your observations of the challenges or obstacles faced during the exercise?
Comment:
Please describe any difficulties you encountered to acquire information needed to perform your role?
Comment:
What observations do you have about the integration of agency and industry participants?
Comment:

What recommendations would you like to make for future exercises?
Comment:

If you want to provide additional comments after the exercise, please contact:

Name: _____ Email: _____