

Attachment G

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MARINE FACILITY OIL SPILL CONTINGENCY PLAN

INTRODUCTION

E&B Natural Resources Management Corporation, the Applicant, is proposing the development of the E&B Oil Development Project (proposed project) on a 1.3-acre project site located at 555 6th Street in the City of Hermosa Beach (City). The project site is bounded on the east by Valley Drive and on the south by 6th Street, approximately seven blocks east of the beach and the Pacific Ocean. The project site is owned by the City and is currently used as their City Maintenance Yard. The Project Applicant will lease the project site from the City for the implementation of the proposed project.

The proposed project provides for the development of an onshore drilling and production site that would utilize directional drilling of 30 wells to access the oil and gas reserves in the tidelands (granted by the State of California to the City) and in an onshore area known as the uplands. Both of these areas are located within the Torrance Oil Field. In addition, the proposed project would result in the drilling of four water injection wells, relocation of the City Maintenance Yard to another site, and the installation of offsite underground pipelines for the transport of the processed crude oil and gas from the project site to purchasers.

The offsite underground pipeline for the transport of oil to a valve box location in the City of Torrance would be constructed for a maximum distance of approximately 3.55 miles in one of three pipeline scenarios that would transverse through the Cities of Hermosa Beach, Redondo Beach, and Torrance. The oil pipeline would be constructed for a distance of 0.39 mile in the right of way (ROW) of southbound Valley Drive in the City of Hermosa Beach to the corner of Valley Drive/N. Francisca Avenue and Herondo Street in the City of Redondo Beach. At this point, the oil pipeline would be constructed towards the east within the ROW of Herondo Street, Anita Street, and 190th Street or within the Southern California Edison Utility Corridor until it reaches one of the four valve box locations in the Cities of Redondo Beach or Torrance. The pipeline would be 8 inches or less in diameter, located at a depth of 3.5 to 4 feet below ground surface depending on the grade.

In addition, in Phase 2 before the construction of the pipeline occurs, oil would be transported from the project site by tanker truck along Valley Drive before it heads east on Herondo Street, Anita Street, and 190th Street to a delivery destination in Torrance.

The western portion of the proposed offsite underground oil pipeline, and the western portion of the oil delivery route are located within proximity of the storm drains that lead to marine waters of the Pacific Ocean. Refer to Figures 2, 4A, 4B, and 4C of the Planning Application Project Description dated November 2012 for the location and setting of the project site and the offsite underground oil pipeline alignment scenarios. In addition, refer to Figure 7 of the Planning Application Project Description for the oil delivery route for the transportation of oil by tanker truck during Phase 2.

PLAN PURPOSE AND CONTENT

California Code of Regulations Title 14, Division 1, Subdivision 4, Office of Oil Spill Prevention and Response, Chapter 3. Oil Spill Prevention and Response Planning, Subchapter 3. Oil Spill Contingency Plans sets forth the planning requirements for oil spill prevention and response for tank vessels and marine facilities in California. The proposed project appears to meet the definition of a marine facility since it would be considered to have the potential to impact marine waters based on the geographical location of the western portion of the offsite underground oil pipeline in proximity to the Pacific Ocean. The proposed project would not involve tank vessels. Therefore, prior to operations, E&B (as owner/operator of the proposed project) will prepare an oil spill contingency plan (plan) in compliance with the requirements of the California Code of Regulations as discussed below.

The purpose and intent of the plan would be to provide for the “best achievable protection of coastal and marine resources” and “ensure that all areas addressed by the plan are at all times protected by prevention, response, containment and clean-up equipment and operations” (subsection 815.07(c)). The plan would be prepared “consistent with the State Marine Oil Spill Contingency Plan and not in conflict with the National Oil & Hazardous Substances Pollution Contingency Plan, or the applicable Federal Area Contingency Plans” (subsection 815.07(d)).

The plan would be submitted to the Office of Spill Prevention and Response (OSPR) so that it is received by OSPR at least 180 days prior to the beginning of operations. Copies would be sent to the California State Lands Commission. The plan holder would be notified whether the plan has been denied or approved within 180 days after receipt by the OSPR Administrator. When the plan has been approved, the plan holder would be notified through the issuance of a Letter of Approval issued by the OSPR that describes any conditions of approval and the expiration date.

The plan would be maintained by the Applicant in separate volumes. The principal volume would contain all the required information, calculations, studies, maps, and related data. A separate volume would be set up to serve as a response manual and contain only the information that response personnel would need in the event of a spill to aid in the immediate notification of the appropriate parties and the implementation of the response actions.

It should be noted that plans or portions of other plans submitted to other federal and state agencies may serve as a substitute for all or parts of the oil contingency plan. The OSPR Administrator would determine if the use of a substitute plan or sections of a plan would be appropriate prior to the final plan approval.

The following provides the preliminary contents of the Oil Spill Contingency Plan for the proposed project.

**PRELIMINARY CONTENT OF
MARINE FACILITY OIL SPILL CONTINGENCY PLAN**

1.0 Introduction

- 1.1 The Marine Facility Oil Spill Contingency Plan (plan) shall provide the following information:
- Name and address of the marine facility;
 - Name, address, phone number, facsimile number, and email address of the owner and/or operator of the marine facility;
 - Name, address, phone number, facsimile number, and email address of the person to whom correspondence should be sent;
 - A certification statement signed by an executive or Qualified Individual (with training and experience in oil spill prevention) within the plan holder's management who is authorized to fully implement the oil spill contingency plan and who shall review the plan for accuracy, feasibility, and if it is executable; and
 - The California Certificate of Financial Responsibility (COFR) number for the marine facility. The COFR is the official written acknowledgement that the owner/operator has demonstrated to the satisfaction of the OSPR Administrator the financial ability to pay for costs and damages caused by an oil spill. If the COFR is not available when the plan is submitted because the marine facility is not yet operational, the COFR number must be provided as soon as it becomes available. The COFR number must be provided before the plan can be approved.
- 1.2 The plan shall identify a Qualified Individual (with training and experience in oil spill prevention) and any alternative(s) that may be necessary for the purpose of implementing the plan. If the plan holder contracts for this service, the plan shall include documentation that the Qualified Individual, company, or alternate(s) acknowledges this. If an alternate(s) is identified in the plan, then the plan shall also describe the process by which responsibility will be transferred from the Qualified Individual to the alternate(s). During spill response activities, notification of such a transfer shall be made to the State Incident Commander at the time it occurs.
- 1.3 The plan shall provide the name, address, telephone number, and facsimile number of an agent (located in California) designated to receive legal documents on behalf of the plan holder. If the plan holder contracts for this service, documentation that the agent acknowledges this capacity shall be included in the plan.
- 1.4 The plan shall identify a Spill Management Team. If the plan holder contracts for this service, documentation that the Spill Management Team acknowledges this capacity shall be included in the plan.

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- 1.5 The plan shall contain a copy of the contract or other approved means verifying that any oil spill response organization(s) that are named in the plan will provide the requisite equipment and personnel in the event of an oil spill. To meet regulatory requirements, the plan holder shall only contract with an Oil Spill Response Organization (OSRO) rated by the Office of Spill Prevention and Response (OSPR) for the booming, on-water recovery and storage, and shoreline protection services required. For other required services, including shoreline clean-up, waste management, and spill response management, contracts with non-rated OSROs may be used.

2.0 Marine Facility Description

- 2.1 The plan shall describe the design and operations of the proposed project (referred to herein as the marine facility) with specific attention to those areas from which an oil spill could occur. This description shall include, at a minimum, the following information:
- A piping and instrumentation diagram and a tank diagram including the location of pumps, valves, vents, and lines; the number and oil storage capacity of each structure covered under the plan and its age, design, construction, and general condition; the range of oil products normally stored in each structure; the presence or absence of containment structures and equipment; and the location of oil transfer locations, control stations, safety equipment, drip pans, and the drainage for drip pans;
 - A description of the types, physical properties, health and safety hazards, maximum storage or handling capacity, and current normal daily throughput of oil handled. A material safety data sheet (MSDS) or equivalent will meet some of these requirements and can be maintained separately at the facility providing the plan identifies its location;
 - A description of the normal procedures for transferring oil from or to a pipeline, tanker truck, or storage tank and the amount, frequency, and duration of oil transfers;
 - The marine facility's normal hours of operation; and
 - As a production facility, a complete description of those sections of the oil or gas lease field, gathering lines, storage tanks, and processing facilities, under the control of the owner/operator, from which a spill could reasonably be expected to impact the marine waters of California.
- 2.2 The plan shall describe the marine facility site and surrounding area including, where appropriate, the following information:
- A map and description of site topography, including the drainage and diversion plans for the marine facility, such as sewers, storm drains, catchment, and containment, diversion systems, or basins, oil/water separators, and all watercourses into which surface runoff from the facility drains;

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- Vicinity maps showing any vehicular access to and from the marine facility including the routes for the transport of oil by tanker truck, pipelines to and from the facility, nearby residential, commercial, or other populous areas, and, if needed, access to private land necessary to respond to a spill;
 - Seasonal hydrographic and climatic conditions including wind speed and direction, air and water temperature, local tides, prevailing currents, and any local visibility problems;
 - Physical geographic features, including ocean depths and local bathymetry; beach types and other geological conditions, including type of soil and terrain; operational conditions such as physical or navigational hazards, traffic patterns, permanent buoys, moorings, and underwater structures or other site-specific factors; and any other physical feature or peculiarity of local waters that call for specific precautionary measures that may affect spill response;
 - Logistical resources within the geographic area covered by the plan, including facilities for fire services, medical services, and accommodations for spill response personnel; and
 - Shoreline access area, including piers, docks, boat launches, and equipment and personnel staging areas.

3.0 Risk Hazard Analysis and Identification of Prevention Measures

- 3.1 A Risk Hazard Analysis shall be prepared and prevention measures identified in order to reduce the possibility of an oil spill occurring as a result of the operation of the marine facility. The prevention measures must mitigate or eliminate the hazards identified in the Risk and Hazard Analysis as described below.
- 3.2 A Risk and Hazard Analysis shall be prepared to identify the hazards associated with the operation of the marine facility, including: operator error, the use of the facility for drilling and production, equipment failure, transport of oil by tanker truck, transport of oil and gas by pipeline, and external events likely to cause an oil spill. The chosen hazard analysis method must be conducted in accordance with the guidelines established by the American Institute of Chemical Engineers as published in the “Guidelines for Hazard Evaluation Procedures,” second edition, copyright 1992, prepared for The Center For Chemical Process Safety. The plan shall include a summary of the results of the Risk and Hazard Analysis. The summary shall include the following:
- The hazard analysis method used and a statement that the analysis is specific to the marine facility. If the analysis relies on a risk assessment at a similar facility, the summary shall specify how the two facilities are comparable;
 - An inventory of the hazards identified;
 - An analysis of the potential oil discharges, including the size, frequency, cause, duration, and location of all significant spills from the marine facility as a result of each major type of hazard identified;

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- The prevention (control) measures that will be used to mitigate or eliminate the hazards identified. The plan shall include timeframes for implementing any prevention measures that cannot be functional immediately; and
 - A prediction of oil spills that might still be expected to occur after any mitigating prevention (control) measures have been implemented.

All supporting documentation used to develop the Risk and Hazard Analysis summary shall be made available to the OSPR Administrator upon request.

3.3 Based on the trajectory of the spilled oil as determined in the Risk Hazard Analysis, the plan shall identify off-site resources at risk from oil spills. Two separate maps shall be used to identify the locations of the environmentally sensitive sites and the economically and culturally sensitive sites that may be impacted. The environmentally sensitive sites may include, but not be limited to: shoreline types and associated marine resources; the presence of migratory and resident marine birds and mammal migration routes, breeding, nursery, and other population concentration areas by season; the presence of aquatic resources; the presence of natural terrestrial animal and plant resources; the presence of state and federal-listed rare, threatened, or endangered species; and the presence of commercial and recreational fisheries. The economically and culturally sensitive sites may include, but not be limited to: public beaches, parks, marinas, and diving areas; industrial and drinking water intakes, power plants, and other underwater structures; off-shore oil and gas leases and associated drilling/production platforms; known historical and archeological sites and areas of cultural or economic significance to Native Americans; and major waterways and vessel traffic patterns.

3.4 The Risk and Hazard Analysis shall identify prevention measures to mitigate or eliminate identified hazards that pose potential impacts to those resources at risk from oil spills. Each plan shall include the following:

- Schedules, methods and procedures for testing, maintaining, and inspecting pipelines and other structures within or appurtenant to the marine facility that contain or handle oil which may impact marine waters if a failure occurs;
- Methods to reduce spills during transfer and storage operations, including overflow prevention measures and immediate spill containment provisions;
- Procedures to assure clear communication among all the parties involved during transfer operations;
- Protection measures for areas within the marine facility that are subject to flooding; and
- Additional relevant information at the request of the Administrator.

4.0 Procedures for Containment Booming and On-Water Recovery Response Resources

The plan holder must have a contract or other approved means for providing adequate containment booming and on-water recovery response resources up to the Response

Planning Volume for all potential oil spills from the marine facility. To determine the amount of response resources for containment booming and on-water recovery, the plan holder must calculate a Response Planning Volume as outlined below.

4.1 Calculation of Reasonable Worst-Case Spill

- To calculate the Response Planning Volume for the marine facility, it is first necessary to determine the reasonable worst-case spill for the facility, as follows:
 - The loss of the entire capacity of all in-line, break-out, and portable storage tank(s) needed for the continuous operation of the pipelines used for the purposes of handling or transporting oil, taking into account the existence of volume limiting factors including, but not limited to, line pressure, gravity, and the availability and location of the emergency shut-off controls; plus
 - The amount of additional spillage that could reasonably be expected to enter California marine waters during emergency shut-off, transfer or pumping operations if a hose(s) or pipeline(s) ruptures or becomes disconnected, or if some other incident occurs which could cause or increase the size of an oil spill. The spillage shall be calculated as follows: the maximum time to discover the release from the pipe or hose in hours, plus the maximum time to shut down flow from the pipe or hose in hours (based on historic discharge data or the best estimate in absence of historic discharge data for the marine facility) multiplied by the maximum flow rate expressed in barrels per hour (based on the maximum relieve valve setting or maximum system pressure when relief valves are not provided) plus the total line fill drainage volume expressed in barrels.
- The OSPR Administrator has the discretion to accept that a marine facility can operate only a limited number of the total pipelines at a time. In those circumstances, the reasonable worst-case spill volume shall include the drainage volume from the piping normally not in use, in addition to the volume determined above.
- To calculate the Response Planning Volume for the pipeline that will transport oil to the point of sale, it is necessary to use one of the following methods:
 - The pipeline's maximum release time in hours (i.e., the time between pipeline rupture and discovery), plus the maximum shut-down response time in hours (based on historic discharge data or in absence of such historic data, the operator's best estimate), multiplied by the maximum flow rate expressed in barrels per hour (based on the maximum daily capacity of the pipeline), plus the largest line drainage volume after shutdown of the line section(s) in the response zone expressed in barrels. (As used in this context, a line section means a continuous run of pipe that is contained between adjacent pressure pump stations, between a pressure pump station and a block valve, or between adjacent block valves. Response zone means a geographic area either along a length of pipeline, containing one or more adjacent line sections, for which the

owner/operator must plan for the provision of spill response capabilities and resources. The size of the zone is determined by the owner/operator after considering available capabilities, resources, and geographic characteristics); or

- The largest foreseeable discharge for the line section(s) within a response zone, expressed in barrels, based on the maximum discharge, if one exists, adjusted for any subsequent corrective or preventative action taken.
- The Response Planning Volume for the transport of oil by tanker truck would be the largest volume expected to be hauled by a single truck.

4.2 Calculation of Response Planning Volume

- The reasonable worst-case spill volume is multiplied by a persistence factor relative to the most persistent type of oil that may be spilled by the marine facility. The volume determined from this calculation is then multiplied by an emulsification factor based on the type of oil. The total determined by this calculation is the Response Planning Volume.
- The Response Planning Volume is used to determine the amount of Response Equipment and Services that must be under contract or other approved means.
- All calculations used to determine the Response Planning Volume shall be included in the plan.

4.3 Response Capability Standards and Movement of Resources

- The equipment and personnel necessary to address the Response Planning Volume shall be brought to the scene of the spill over a period of time. The timeframes are dependent upon the risk zone in which the marine facility is located.
- The OSPR Administrator needs to ensure that sufficient response resources are available to address a reasonable risk within each zone.

4.4 On-Water Response Equipment and Services

- The plan shall demonstrate that the marine facility owner/operator has under contract or other approved means access all the necessary response resources. The amount of response equipment required shall take into account the effective daily recovery capacity of the equipment.
- The equipment identified for a specific area must be appropriate for use in that area given the limitations of the geography, bathymetry, water depths, tides, currents and other local environmental conditions. If determined to be needed, for those areas that require shallow-water response capability, the plan shall provide for an adequate number of shallow-draft vessels and for adequate booming and other shoreline protective resources to be owned or under contract or other approved means and available to provide shoreline protection of all sensitive sites identified

in the trajectory analysis conducted as part of the Risk and Hazard Analysis. The equipment identified shall also be appropriate for use on the type of oil identified.

- The plan shall describe procedures for the transport of required equipment, personnel, and other resources to the spill site. The description shall include plans for alternative procedures during adverse environmental conditions.
- A list of the marine facility's spill management personnel (and company name if applicable) and their spill response qualifications, including a discussion of spill response training and experience, regulatory awareness and compliance, and supervision, shall be provided.
- Any equipment and personnel identified in the plan must be available for response. Any necessary maintenance for the equipment or other factors must be taken into account in relying upon these resources.

5.0 Procedures for Shoreline Protection

The plan must provide for shoreline protection of all potential spills from the marine facility as discussed below.

5.1 Shoreline Response Planning Volume

- The plan shall demonstrate that the marine facility has access to all necessary equipment and services to address the response strategies appropriate to each shoreline that could potentially be impacted by a spill from the facility.
- To determine the amount of equipment and services necessary, a Response Planning Volume must be calculated by multiplying the reasonable worst case spill for the marine facility, by the appropriate persistence factor. The Planning Volume is then multiplied by the appropriate emulsification factors based on the type of oil. The total determined by this calculation is a Response Planning Volume that is used to determine the amount of Response Equipment and Services that must be under contract. All calculations used to determine the Response Planning Volume shall be included in the plan.

5.2 Shoreline Protection Equipment and Services

- The plan must identify, and ensure availability through a contract or other approved means the capability of effecting shoreline protection strategies. Such protection strategies must be commensurate with the Response Planning Volume calculated for potential shoreline impact and must be capable of addressing all appropriate protection and response strategies. The specific areas where equipment and services must be available for use shall be identified in the Off-Site Consequence Analysis in the Risk and Hazard Analysis.
- The equipment identified for a specific area must be appropriate for use in that area given the limitations of bathymetry, geomorphology, shoreline types and other local

environmental conditions. Additionally, the equipment identified shall be appropriate for use on the type of oil identified.

- Any equipment and personnel identified to meet the planning standard requirements must be available for response. Any necessary maintenance for the equipment, vacation periods for response personnel, or other eventuality must be taken into account in relying upon these resources.

5.3 Shoreline Clean-Up

- The plan shall describe the methods that will be used to contain spilled oil and remove it from the environment.
- The equipment identified for a specific area must be appropriate for use in that area given the limitations of the bathymetry, geomorphology, shoreline types, and other local environmental conditions. Additionally, the equipment identified shall be appropriate for use on the type of oil identified.

6.0 Response Procedures

6.1 The plan shall describe the organization of the marine facility's spill response system and management team. An organizational diagram depicting the chain of command shall also be included. Additionally, the plan shall describe the method to be used to interface the plan holder's organization into the State Incident Command System and/or the Unified Command Structure as required by Title 8, California Code of Regulations, Subsection 5192 (q)(3)(A).

6.2 The plan shall identify potential sites needed for spill response operations including allocation for:

- A central command post sufficient to accommodate the State Incident Command or Unified Command as well as the plan holder's response organizations;
- A central communications post if located away from the command post; and
- Equipment and personnel staging areas.

6.3 The plan shall include a checklist, flowchart, or decision tree depicting the procession of each major stage of spill response operations from spill discovery to completion of clean up. The checklist, flowchart, or decision tree shall describe the general order and priority in which key spill response activities are performed.

6.4 The plan shall describe how the plan holder will provide emergency services before the arrival of local, state, or federal authorities on the scene, including:

- Procedures to control fires and explosions and to rescue people or property threatened by fire or explosion;
- Procedures for emergency medical treatment and first aid;

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- Procedures to control ground, marine, and air traffic that may interfere with spill response operations;
 - Procedures to manage access to the spill response site and the designation of exclusion, decontamination, and safe zones; and
 - Procedures to provide responders with the required personnel protective gear.
- 6.5 The plan shall describe equipment and procedures to be used by marine facility personnel to minimize the magnitude of a spill and minimize structural damage which may increase the quantity of oil spilled, including:
- For spill magnitude procedures, the plan shall include shall include immediate containment strategies, methods to stop the spill at the source, methods to slow or stop leaks, and methods to achieve immediate emergency shutdown.
 - For spill mitigation procedures, the plan shall include prioritized procedures for marine facility personnel including specific procedures to shut down affected operations. Responsibilities of facility personnel should be identified by job title. A copy of these procedures shall be maintained at the facility operations center.
- 6.6 The plan shall detail the lines of communications between the responsible party, the Qualified Individual, and the on-scene coordinators, response teams, and local, state, and federal emergency and disaster responders.
- 6.7 The plan shall describe the procedures to manage access to the spill response site, the designation of exclusions, decontamination and safe zones, and the decontamination of equipment and personnel during and after oil spill response operations.
- 6.8 Prior to beginning spill response operations and/or clean up activities, a Site Safety Plan must be completed. The Site Safety Plan shall include, but not limited to, a written respiratory protection program, written personnel protective equipment program, written health and safety training program, written confined space program and permit forms, direct reading instrument calibration logs, and written exposure monitoring program.
- 7.0 Notification Procedures**
- 7.1 The plan shall include a list of contacts to call in the event of a drill, threatened discharge of oil, or discharge of oil. The plan shall:
- Detail the procedures for reporting oil spills to all appropriate local, state, and federal agencies;
 - Identify a central reporting office or individual who is responsible for initiating the notification process and is available on a 24-hour basis. The individual making this notification must be fluent in English. The following information must be provided:
 - The individual or office to be contacted;

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- Telephone number or other means of contact for any time of the day; and
 - An alternate contact in the event the individual is unavailable.
 - Establish a clear order of priority for notification.
- 7.2 The plan shall include a procedure for immediate notification of the OSRO or other initial response resources if an OSRO is not being used, immediately, but no longer than 30 minutes, after discovery of a discharge of oil or threatened discharge of oil.
- 7.3 The plan shall include a procedure that ensures that the owner/operator or designee will initiate contact with the Qualified Individual, the California Emergency Management Agency, and the National Response Center immediately, but no longer than 30 minutes, after discovery of a discharge of oil or threatened discharge of oil.
- 7.4 All phone numbers necessary to complete the immediate notification procedures must be included in the response manual.
- 7.5 The plan shall identify a call-out procedure to acquire the resources necessary to address spills that cannot be addressed by the equipment that the owner/operator is required to have under contract. Procedures must allow for initiation of the call-out within 24 hours of the incident and must begin as soon as a determination has been made that additional resources are necessary.
- 7.6 The plan shall provide a checklist of the information to be reported in the notification procedures, including but not limited to:
- Marine facility name and location;
 - Date and time of the incident;
 - The cause and location of the spill;
 - An estimate of the volumes of oil spilled and the volume at immediate risk of spillage;
 - The type of oil spilled, and any inhalation hazards or explosive vapor hazards, if known;
 - The size and appearance of the slick;
 - Prevailing weather and sea conditions;
 - Actions taken or planned by personnel on scene;
 - Current condition of the marine facility;
 - Injuries and fatalities; and
 - Other information, as appropriate.
- 7.7 Reporting of a spill shall not be delayed solely to gather all the required information.

7.8 An updated estimate of volume of oil spilled and the volume at immediate risk of spillage shall be reported to the California Emergency Management Agency whenever a significant change in the amount reported occurs, but not less than every 12 hours within the first 48 hours of response. The State Incident Commander and/or the Federal On-Scene Coordinator through the Unified Command shall have the option of increasing or decreasing this timeframe, as needed.

8.0 Temporary Storage and Waste Management

8.1 The plan shall identify sufficient temporary storage for all recovered oil or all oily waste and identify facilities that would be able to accept the recovered oil or oily waste for recycling or other means of waste management. Sufficient storage shall be no less than two times the calculated Response Planning Volume up to the Daily Recovery Rate.

9.0 Oiled Wildlife Care Requirements

9.1 The plan shall describe how oiled wildlife care will be provided by one of the following approved means:

- Utilize the California Oiled Wildlife Network (OWCN) to meet oiled wildlife care requirements; or
- Describe procedures that clearly outline how oiled wildlife care will be provided. The equipment, facilities, and personnel necessary to implement these procedures must be identified and assured by contract for each Geographic Area covered by the plan. Standards and written protocols for wildlife care must comply with all applicable State and federal laws.

10.0 Training

10.1 Each plan shall provide that all appropriate personnel employed by the marine facility shall receive training in the use and operation of oil spill response and clean-up equipment.

10.2 The plan shall describe the type and frequency of personnel training on methods to reduce operational risks.

10.3 The plan shall include any licenses, certifications or other prerequisites required to hold particular jobs.

10.4 The plan shall provide for safety training as required by state and federal health and safety laws for all personnel likely to be engaged in oil spill response, including a program for training non-permanent responders such as volunteers or temporary help.

10.5 The marine facility owner/operator shall ensure that training records are maintained for 3 years.

11.0 Drills and Exercises

11.1 The plan shall describe the marine facility's drill and exercise program to ensure that the elements of the plan will function in an emergency.