

# Class 2 Drill Program Implementation Plan

Washington State Department of Ecology (Ecology) Drill Team will begin working with Class 2 mobile facilities to integrate their drill exercises into the Washington state drill program, as outlined in WAC 173-180 (FACILITY OIL HANDLING STANDARDS) – PART H. See full text of this WAC at [Chapter 173-180 WAC](#):

Under this regulation, a "Class 2 facility" refers to a railroad car, motor vehicle, portable device, or other rolling stock, while not transporting oil over the highways or rail lines of the state, used to transfer oil to a nonrecreational vessel. In accordance with this regulation, Class 2 facilities are required to conduct the following numbers and types of drills each calendar year, throughout their Ecology assigned triennial cycle.

Note that these drill requirements are intended to be consistent with federal drill program requirements already satisfied by most facilities. This allows for each drill to potentially satisfy both federal and state drill requirements.

## Drill Requirements

<b>WAC 173-180-810</b>		
<b>Type of Drill</b>	<b>Frequency within the Triennial Cycle</b>	<b>Scope and Scale</b>
Qualified individual (QI) notification	12 times over the triennial cycle (quarterly each year)	Notify the QI and alternate Qi(s).
Tabletop drills	3 total (one per year)	One of the three must involve a worst-case scenario.
Deployment drills	6 total (two per year)	Over the triennial cycle, this drill may include deployment of PRC and facility owned equipment. Drill credit may be given for pre-booming an oil transfer.
Ecology initiated unannounced drills	As necessary	This drill may include notifications described in the oil transfer response plan or deployment of equipment.

### Other Drill Requirement Details (WAC 173-180-815)

- (1) the tabletop and deployment drills must meet the following requirements:
  - (a) be designed with Ecology;
  - (b) be scheduled in advance using the Northwest area committees exercise schedule:
    - (i) Thirty calendar days in advance for deployment drills;
    - (ii) Sixty calendar days in advance for tabletop drills; and
    - (iii) Ninety calendar days in advance for worst case spill drills.
- (2) Over the triennial cycle, deployment drills are intended to include state-approved PRC-owned equipment through a written agreement; facility owned equipment; and equipment as certified available for the facility through letters of intent, mutual aid agreements, contracts, or other approvable means.
- (3) Ecology may attend and evaluate tabletop and deployment drills.
- (4) Facilities may request drill credit for a spill response by submitting documentation of the response to ecology within 30 calendar days of completion of the cleanup operations.

### Class 2 Drill Program Implementation Timeline

Ecology will work with Class 2 facilities over the next three years to phase in the new drill requirements using the following timeline:

Year	Requirements
2025	Facilities will continue to plan and conduct drills as they have been required to do under their existing federal requirements. Beginning this year, each facility will now need to enter each of their tabletop (TTX) and deployment (DPX) drills into the Northwest Area Committees Exercise Schedule (NACES) in accordance with WAC drill scheduling requirements (minimum 60 days prior for TTXs, 30 days prior for DPXs, and 90 days prior for worst-case volume TTXs). Facilities should be prepared to provide documentation of completed drills to Ecology upon request.
2026	During this calendar year, facilities will continue to schedule their TTX and DPX exercises on the NACES calendar. Ecology will participate in the planning and evaluation of each TTX exercise. Ecology will also participate in the planning process for one DPX for each facility. Facilities will self-plan their remaining DPX and will self-certify all their DPXs. Ecology may participate in the evaluation of some of these self-certified drills.
2027	During this calendar year, the facilities will continue scheduling their exercises on the NACES calendar. Ecology will participate in the planning

Year	Requirements
	process for all exercises. Ecology will also evaluate all TTXs. Facilities will be assigned a worst-case discharge year. One-third of the TTXs this year will be based on a facility’s worst-case discharge volume. Ecology will also evaluate one of the DPX drills for each facility, with the other DPX being self-certified. Ecology may participate in the evaluation of some of the self-certified drills.
2028	Ecology will participate in all drill planning and evaluation (subject to staff availability). The second group will conduct their worst-case volume TTX this year, with the worst-case volume TTX rotating to the third (last) group in 2029. Currently, all facilities are fully participating in the Washington state drill program.

**Alternative Drill Credit Options**

Upon a facility’s request, Ecology may grant credit for TTX or DPX requirements for the following qualifying activities. The facility must submit a request for drill credit to Ecology within 30 days after tech qualifying activity occurs. Additionally, any credit awarded can only be used within the year the activity took place and only one instance of each type of drill credit will be granted during a single triennial cycle.

- Response credit – limited to once per cycle and can apply to TTX or DPX credit items depending on the actual response activities conducted.
- Government Initiated Unannounced Exercise (GIUE) – limited to once per cycle. The GIUE may include notification or DPX activities and can only apply to DPX drill requirements.
- Pre-booming deployment - limited to once per cycle and can only apply to DPX drill requirements. Requires pre-scheduling with Ecology.
- GRP deployment – limited to once per cycle and can only apply to DPX drill requirements. It may qualify as a multi-plan holder exercise when conducted by a PRC common to participating plan holders located in a similar geographic area. Plan holders are required to participate to receive credit.

Please contact a Washington state drill coordinator if you have questions or need assistance with your drill program:

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