

# US Coast Guard Government Initiated Unannounced Exercises (GIUEs)



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# What is a GIUE?



- A pre-planned, unannounced exercise on facilities & vessels w/ response plans
- A tool for COTPs to evaluate industry preparedness for oil spill response
- Defined in PREP Objectives
- Codified in 33 CFR 154/155



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# Why Do Regulatory Agencies Conduct GIUEs?

- Real-world test of a plan holder's response to an AMPD (< 50bbls. or 1% of a WCD)
- Evaluates notifications, response time, & safe deployment of equipment following a spill
- Requires minimal CG resources
- Strengthens partnerships w/ OGAs & industry partners
- Identifies risk & areas for improvement for spill responses



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# What is Being Evaluated?



- 1) FRP/Proper Notifications
- 2) Timely & Effective Spill Response Actions
- 3) Carry out Spill Response Actions in a Safe Manner



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# USCG Required Participants

- Published Annually in ALCOAST Msg.
- Categorized by COTP Zone
- Annual Quotas Broken Down by # of Fixed MTR Facilities within Each Zone
- COTP zones w/ **12 or More** Fixed MTR Facilities Shall Complete 4 GIUEs Per Year
- COTP zones w/ **Less Than 12** Fixed MTR Facilities Shall Complete 2 GIUEs Per Year (or sometimes less)

## ALCOAST 387/22 - OCT 2022 GOVERNMENT INITIATED UNANNOUNCED EXERCISE (GIUE) PROGRAM REQUIREMENTS FOR FY23

U.S. Coast Guard sent this bulletin at 10/12/2022 09:11 AM EDT

R 121243Z OCT 22 MID600052357111U  
FM COMDT COGARD WASHINGTON DC  
TO ALCOAST

BT

UNCLAS

ALCOAST 387/22

SSIC 16000

SUBJ: GOVERNMENT INITIATED UNANNOUNCED EXERCISE (GIUE) PROGRAM REQUIREMENTS FOR FY23

A. U.S. Coast Guard Marine Environmental Response and Preparedness Manual, COMDTINST M16000.14A

1. Per REF (A), this ALCOAST establishes the FY23 GIUE requirements for Sector and Marine Safety Unit (MSU) Captains of the Port (COTP).

2. GIUEs are a cornerstone of the area oil spill exercise cycle and a key tool for COTPs to evaluate risk and measure oil spill response preparedness. The Office of Marine Environmental Response Policy (CG-MER) continues to require the maximum number of GIUEs permitted under regulation and the Preparedness for Response Exercise Program (PREP) Guidelines, while also taking into account the total number of candidates available within each COTP Zone. Candidates include fixed and mobile Marine Transportation Related (MTR) facilities and tank and non-tank vessels required to have response plans. Units that wish to adjust their requirements shall route a memo to COMDT (CG-MER), via their chain of command, with adequate justification to support a reduction.

3. GIUE requirements are published annually. For the purposes of GIUE reporting requirements, subsequent GIUEs on the same plan holder following an unsuccessful GIUE do not count towards the COTP's annual requirement. FY23 GIUE Requirements:

MSU Duluth 4  
MSU Elmira 4  
MSU Port Arthur 4  
MSU Savannah 2  
MSU Valdez 1  
Sector Anchorage 4  
Sector Buffalo 2  
Sector Sault Ste Marie 4  
Sector Columbia River 4  
Sector Corpus Christi 4  
Sector Delaware Bay 4  
Sector Detroit 2  
Sector Gulf of Mexico 4  
Sector Jacksonville 4  
Sector Juneau 4  
Sector Key West 1 (every 3 years)  
Sector Lake Michigan 4  
Sector Long Beach 4  
Sector Los Angeles Long Beach 4  
Sector Lower Mississippi River 4  
Sector Mobile 4  
Sector New Orleans 4  
Sector New York 4  
Sector North Carolina 2  
Sector Northern New England 4  
Sector Oig 4  
Sector San Diego 2  
Sector San Francisco 4  
Sector San Juan 4  
Sector Southeastern New England 4  
Sector Sault Ste. Marie 1  
Sector St. Petersburg 4  
Sector Upper Mississippi River 4  
Sector Virginia 4

• **MSU Duluth**

• **Sector Sault Ste Marie**

• **Sector Detroit**

• **Sector Lake Michigan**

• **Sector Buffalo**



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# Interagency Participation in Exercises

- Benefits both plan holders & regulatory agencies
- Strengthens partnerships
- Reduces redundancy & duplication of effort
- Examples of participating agencies include EPA, BSEE, and State Environmental Response Agencies

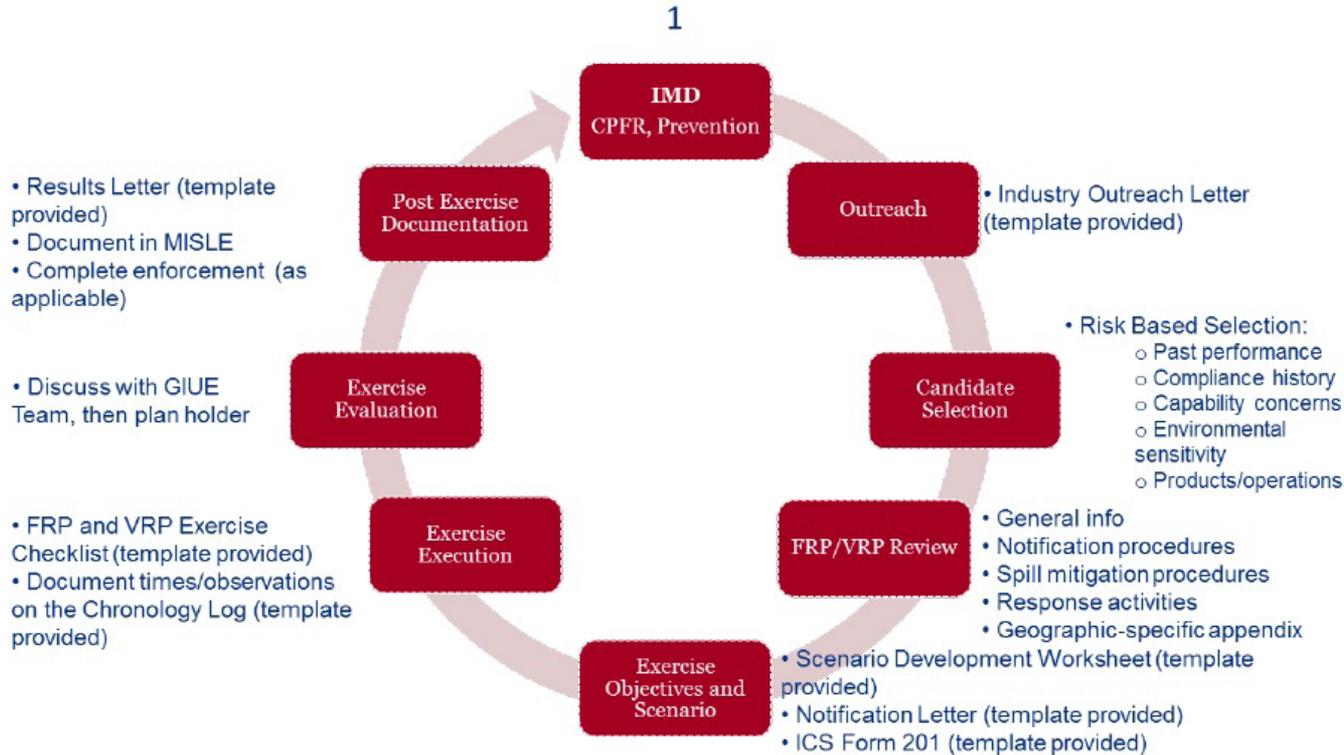


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# Annual Cycle

## GIUE Implementation Process



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# Exercise Objectives & Scenario Development:

- Scenarios should realistic and based on AMPD
- Should be tailored to applicable plan holder's operations
- Should take real-world environmental into account

1. Incident Name Marathon GIUE	2. Prepared by: MSTC Chavalia / MST2 Little Date: 12 Oct 2022 Time: 0930	INCIDENT BRIEFING ICS 201-CG
3. Map/Sketch (include sketch, showing the total area of operations, the incident site/area, overflight results, trajectories, impacted shorelines, or other graphics depicting situational and response status)		
		
On October 11, 2022, the terminal received approx. 1000 bbls of asphalt. On October 12, 2022 after the discharging barge departed it was discovered that the blank on receiving pipeline was not secured properly and approx. 500bbls (2100gallons) of asphalt entered the Cuyahoga River.		
5. Initial Response Objectives, Current Actions, Planned Actions		



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# Execution Considerations

- Operational Impact to Facility/Vessel
- Time Limit (4 Hours)
- Interagency Coordination
- Equipment Deployment (No Simulations)
- Plan Holders Assume Cost



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# Evaluation

- Satisfactory
  - Facility or Vessel will receive a Follow-Up GIUE Letter documenting compliance.
  - Provides a 36-month exclusion from CG-facilitated GIUEs.
- Unsatisfactory
  - Unit will Document Deficiencies
  - Establish Correction Deadline
  - Conduct Follow-Up GIUE

U.S. Department of Homeland Security  
United States Coast Guard



Commander  
United States Coast Guard  
Sector/MSU

Address  
Address  
Phone:  
Fax:

16480  
Date

Name  
Role  
Company  
Address  
City, State Zip

Dear [NAME],

On [DATE], this office conducted a Government Initiated Unannounced Exercise (GIUE) on your [facility/vessel]. The purpose of this GIUE was to test the facility response plan/vessel response plan (FRP/VRP) notification and response capabilities for an average most probable discharge (AMPD) in accordance with 33 C.F.R. § 154.1055(b) / 33 C.F.R. § 155.1060(c) / 33 C.F.R. § 155.5060. The GIUE Team has determined that you satisfactorily completed the exercise in accordance with your FRP/VRP and all applicable guidelines and regulations.

Having successfully completed the GIUE, you may claim credit for the following exercises as required by 33 C.F.R. § 154.1055 / 33 C.F.R. § 155.1060 / 33 C.F.R. § 155.5060:

1. Qualified Individual notification exercise
2. Equipment deployment exercise
3. Unannounced exercise

Please keep a copy of this letter to document your completion of the GIUE and credit for the above exercises. You can expect that your facility/vessel will not be subject to another Coast Guard GIUE for at least 36 months from the date of the exercise. [All other fleet trucks or vessels covered by this FRP/VRP may be subject to a GIUE in other COTP Zones.] Please contact [NAME] at [NUMBER] should you have any questions. Congratulations on a successful exercise and thank you for your efforts to improve marine environmental response preparedness.

Sincerely,

[NAME]  
Captain, U.S. Coast Guard  
Captain of the Port



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# Refusal to Participate

- If plan holder refuses exercise:
  - GIUE team shall take necessary enforcement action (typically issued as a civil penalty documented as part of GIUE).
  - Plan holder is subject to another exercise at any time at COTP discretion (36-month exception does not apply)



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# Common GIUE Issues/Areas for Improvement in the Ninth District

- **CG:**

- Coordination w/ Interagency Partners (Joint GIUEs)
- Internal Coordination w/ Subunits
- Standardized guidance on Vessel/Group V (non-floating oil) Facilities
- Procrastination (Hurricane Season)

- **Industry:**

- Lack of Familiarity w/ FRP/VRP
- Significant OSRO delays or failure to Arrive on Scene w/ Recovery Equipment



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## USCG Ninth District GIUE Program

### FY 2023

#### FY22 Background/Situation

- Ninth District units completed 10/10 GIUEs in FY22.
- Of the 10 GIUEs completed, 3 were conducted jointly w/ EPA.

#### FY23 GIUE Program Priorities:

- CG-MER released ALCOAST 387/22 providing FY23 GIUE guidance to units and Districts.
- Language in previous GIUE ALCOASTS prohibiting exercises on Group V (non-floating oil) facilities removed. Units were advised to hold off on Group V GIUEs, pending legal review.
- CG-MER provided language encouraging more VRP GIUEs.
- CG-wide audit of COTP MTR Facilities in each AOR (waivers).
- Updated GIUE exercise workbook in development; D9 provided input.

### Ninth Coast Guard District

D9 Marine Environmental Response Measures

#### FY 22/23 GIUE Results



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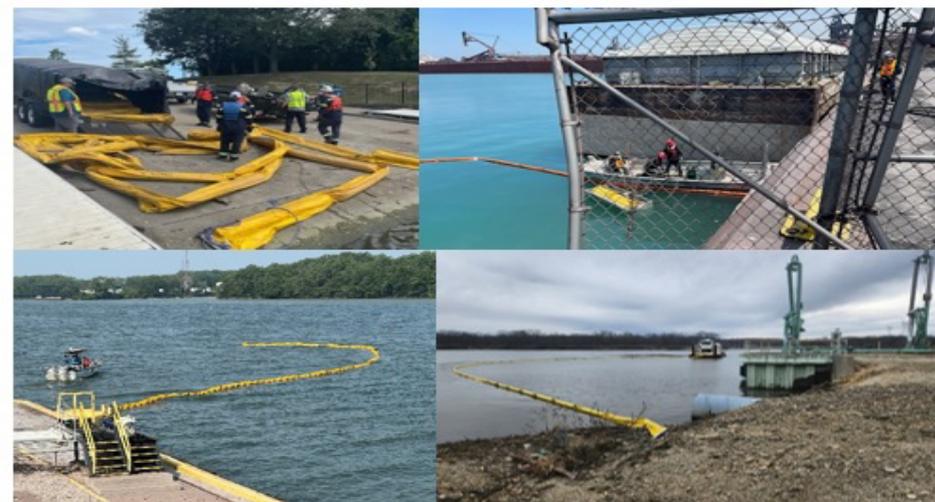


#### FY23 D9 GIUE Program Highlights:

- Ninth District units completed 9/10 GIUEs in FY23.
- Of the 9 GIUEs completed, 2 were conducted jointly w/ EPA.
- 1 GIUE was completed in Q1; 1 in Q2; 1 in Q3; & 6 in Q4.
- 1 GIUE not completed due to COTP decision (EPA conducted GIUE within 18 months, Facility Completed TTX & FSE within previous year).

#### FY24 Way-Ahead

- FY24 GIUE ALCOAST to be released (October 2023).
- FY24 GIUE quotas for D9 not anticipated to change from FY23.



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## Ninth District FY23 Government Initiated Unannounced Exercise Map

Great Lakes Fleet  
22SEP23

US Energy/US  
Venture  
26SEP23

WT Terminal  
22SEP23

Kinder Morgan  
21JUL23

Omega Partners LLC  
23MAR23

Sunoco Blue Island  
Facility  
05SEP23

Tanco Terminals  
26MAY23

Waterfront  
Petroleum  
07SEP23

Ohio Refining  
Company  
21AUG23

Marathon Petroleum  
18OCT22

### CG Ninth District SR-UAS Assets

	Successful GIUE
	Unsuccessful/Not Completed GIUE



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# Questions?

