



# Government-Initiated Unannounced Exercises (GIUEs)

# What is a GIUE?

- GIUE: Government-Initiated Unannounced Exercise
- GIUE based on the National Preparedness for Response Exercise Program (PREP) Guidelines
- EPA Authority to conduct GIUEs: CWA 311(j)(7); NCP (40 CFR 300.212)
- EPA Region 8 conducts approximately 25 - 30 GIUES each year in Colorado, Utah, Wyoming, Montana, North Dakota and South Dakota



# EPA GIUE objectives

- The objective of a GIUE is to evaluate the ability of responders to rapidly and effectively control a small discharge in a 4-hour window.
- Timeliness is not the sole factor during the evaluation but is a key component.
- A GIUE is a full-scale exercise...not a tabletop or simulation



# GIUE Scheduling

- A GIUE is not optional
  - Exercise must proceed even if the Qualified Individual (QI) happens to be on vacation
  - Exercise may be cancelled/postponed if existing conditions present a safety concern
  - Facility may continue normal facility operations during the GIUE
  - Facility is responsible for costs of performing the exercise



# Why me!?!?

- EPA Region 8 targets facilities based on several factors:
  - More than 3 years since the last EPA GIUE
  - Updates to the FRP (new equipment, tanks, change in ownership, etc.)
  - Recent reportable spills
  - Failure of a past GIUE
  - Reference from another EPA, State or Local regulator



# What to Expect During a GIUE

- EPA arrives unannounced at the facility
- Introductory Brief
- GIUE initiated – Up to 4 hours
- FRP/SPCC Inspection
- Closing Brief
- EPA GIUE Successful/Not Successful Letter with recommendations (30-45 days after inspection)

# EPA Planning Process for GIUEs

- Inspectors review the relevant Facility Response Plan
- Select a plausible small discharge scenario from FRP
- Verify a flow pathway to nearest WOTUS
- Formulate the exercise scenario and ground-truth it before arrival at facility





# GIUE – Intro Briefing


- EPA Team and facility management convene in conference room; a Notice of Inspection (NOI) will be signed by Qualified Individual (QI) or a facility representative (See Handout 5-1)
- Facility can include whomever they'd like in the briefing, including via teleconference
- EPA Team will explain the GIUE, inspection process and expectations
- Don't hesitate to ask questions!

# EPA GIUE Spill Scenario

- Small discharge of 2,100 gallons that escapes containment and reaches water
- EPA will specify:
  - Tank or source (not exactly what happened)
  - Type of product
  - Volume discharged
  - Weather conditions, if different from time of the exercise



# EPA GIUE Spill Scenario

- “Tank 101 had a complete failure. There is 2,100 gallons of diesel that has entered the Colorado River (WOTUS).”
- Facility has up to 4 hours to complete the GIUE. The clock starts with the scenario or the call. 
- Don't hesitate to ask questions before, during, or after the GIUE!



# GIUE timeframes

- There are four key time frames that EPA will evaluate:
  - Prompt Notifications
  - Containment Boom and means of deployment on-site within one hour followed by successful deployment of the boom
  - Oil recovery equipment (i.e., skimmer package) on-site within two hours
  - GIUE completed with four hours

# Proper Notifications

- During a GIUE, notifications are conducted... *not simulated*
  - Notifications should be made promptly! National Response Center (NRC) within 15 mins
  - State Spill Line
  - Local agencies, etc.
  - Document who you called and time you called them





## During the GIUE – Command Post

- Are proper notifications conducted in a timely fashion?
  - Are the ERAP and/or FRP being used?
  
- Has the spill response team and/or OSRO been activated?
  - When was response team/OSRO activated? When did they arrive? Can they deploy equipment?
  
- Are communications with response personnel and other facility personnel effective?

# Common Notification Issues

- Staff can't find the FRP or list of notifications
- National Response Center (NRC) should be one of the first calls
- Response contractors are not available
- Lack of clarity over who calls who
- Balancing notifications with implementation of response plan



# Boom or alternative containment device and Personnel On-Site within One Hour

- Sufficient boom or alternative containment device and personnel on-site within one hour
- Generally achieved with properly maintained spill response trailer and trained personnel



# Containment Boom Deployment

- 1,000 feet of boom
- Must be **containment boom**, not made of absorbent materials
- At inland facilities, boom may be deployed in dry ditches if there is no water



# Don't Be Fooled – Know The Difference

## Containment Boom



- Consists of a float and skirt
- Is impermeable
- Required to stop the spread of oil

## Sorbent



- Floats on top of the water; no skirt
- Absorbs oil
- Incapable of stopping/diverting oil

# Common Issues - Boom JH2

- Trailer and equipment poorly maintained
- Can't find the key to the trailer
- Trailer is too large and requires a semi- and CDL to drive
- Wrong type of boom
- Boom segments don't connect SJT1



## Slide 18

---

**SJT1** Added one more  
Swackhammer, J-Troy, 2024-02-22T21:25:08.077

**JH2** Add Energy Transfer Epping photo? Newfield photo? Trailer needed certified driver, full of dead flies  
Horak, Jerica, 2025-02-10T20:37:18.651

# Is This Boom Effective?



# Containment Boom Alternatives

- "As appropriate" in FRP rule provides inland plan holders flexibility – *added to PREP Guidelines in 2016*
- Alternative strategy may be more appropriate where spill pathway could be a dry drainage pathway or tributary
- Alternatives include: underflow dams, temporary containment, dams (soil, etc.), inflatable diaphragms (culvert plugs)



## Slide 20

---

**SJT1** Added some language to clarify.  
Swackhammer, J-Troy, 2024-02-22T21:23:46.571

**JH2** Emphasis  
Horak, Jerica, 2025-02-18T20:14:30.012

# Oil Recovery within Two Hours

- Can be met with fully equipped response trailer
- Functioning skimmer
- Vacuum truck



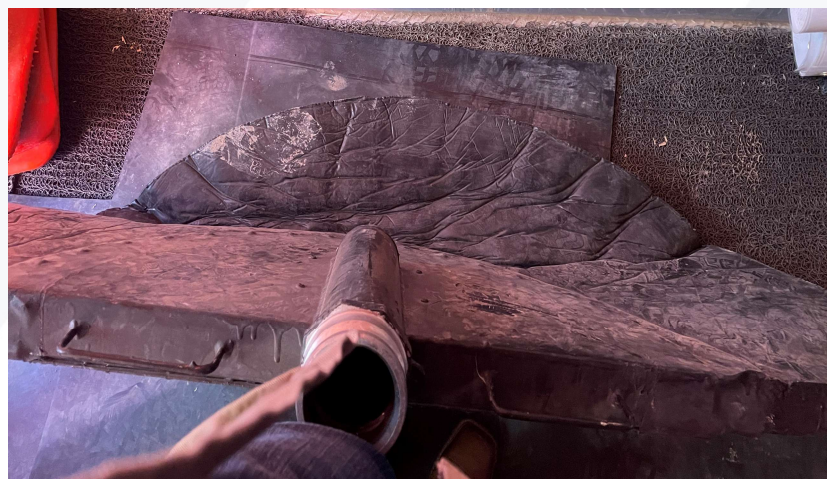
# Provisions for Storage of Recovered Oil

- Oil storage capacity for recovered oily material equivalent to **twice the effective daily recovery capacity** required on-scene, or 4,200 gallons per day



# Common Issues – Oil Recovery

- Equipment doesn't work
- Response trailer doesn't have the proper equipment (i.e. hoses, pumps, etc.)
- Incompatible hose connectors
- Personnel don't know how to deploy equipment
- Vacuum trucks more than 2 hours away



# Complete GIUE within 4 hours

- Boom and oil recovery equipment safely and correctly deployed
- Generally, GIUE will be less than 4 hours

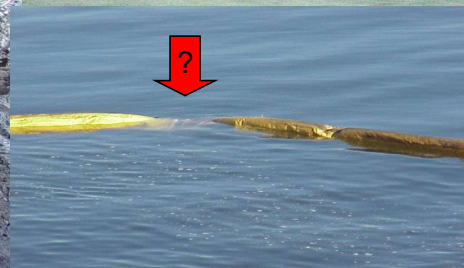
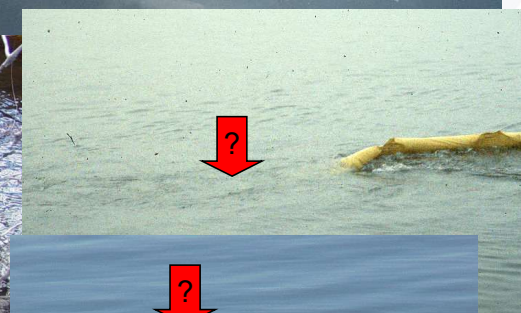
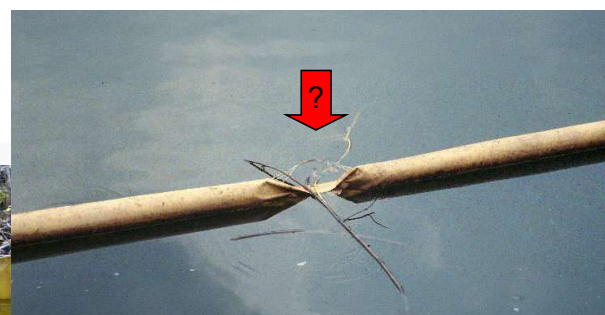




# Common Boom Deployment Problems

- Can facility personnel and/or OSRO deploy the boom?
  - Do they have the required equipment?
  - Do they have **access** to boom deployment sites and anchor points? Can vac truck access control point?
- Is the boom properly deployed?
  - Proper anchoring, proper flotation, proper tension
  - No twists or gaps
- Is the boom maintained in a way to allow for rapid deployment?
- Does the facility have the appropriate hardware needed to link boom sections and stake the boom?

# Boom Deployment Problems



# Ineffective Boom JH1



## Slide 27

---

**JH1** New slide for example of example boom? Fire Dept booming river - Steve has example

Horak, Jerica, 2025-02-10T20:43:17.776

**JH1 0** Add durango fire booming video examples

Horak, Jerica, 2025-02-18T20:17:25.750

# Properly Conducting the GIUE

- Did Facility identify the spill trajectory initially and throughout the exercise?
- Were risks to the environment, business, and public services determined?
- Did the QI identify the resources needed to respond?





# Common Issues –GIUE Completion

- “This could never happen.” Facility unfamiliar with FRP and spill trajectories
- Facility approach GIUE without sense of urgency... too accustomed to tabletops, not drills
- Staff unfamiliar with FRP, including potential downstream impacts and spill response tactics
- Under-trained and unprepared personnel
- QI response: “OSRO will handle it.”



# Common Issues – GIUE Completion

- Facility not conducting drills per PREP Guidelines  
– not practicing the FRP
- Facility too dependent on OSRO and OSRO not familiar with the facility and FRP
- Unable to successfully deploy boom and establish collection



# Unsuccessful GIUE

- The plan holder could not properly implement its response plan.
- Response resources were not available or not in operating condition.
- Response personnel were not adequately trained in implementing the response plan.

# GIUE Completion - Inspection

- FRP/SPCC Inspection completed after the GIUE
- Conduct walk through facility
- Qualified Individual (QI) Interview





# Closing Conference



Reconvene in conference room

Facility can include remote staff members/participants



Discuss additional information needs (i.e., training and exercise records)



De-brief on GIUE and any next steps



EPA will provide a successful/unsuccessful GIUE letter to facility within 45 days.