



Office of Marine Environmental Response Policy

OIL SPILL REMOVAL ORGANIZATION CLASSIFICATION GUIDELINES

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Topics



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- Background
- The Premise for the *Guidelines* Update (BLUF)
 - *Current State*
 - *A variable response*
 - *Qualitative vs. Quantitative (regulatory scheme)*
- Significant Updates: 2016 OSRO Guidelines
 - *Nonfloating Oil Classification*
 - *PAVs*
 - *Dispersants*
 - *NCP connectivity*
 - *Technical / Admin*
- Next Steps

Background

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- Section 311(j) of the Federal Water Pollution Control Act (FWPCA), amended by section 4202 of the Oil Pollution Act of 1990 (OPA 90)
- Relieve the burden upon the plan holders
 - Policy: CG-MER
 - Administrator: NSFCC
- Historically based on boom, temporary storage, EDRC
 - Significant past updates include Dispersants, elimination of AMPD, ACCs

Response Resource Inventory



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- Mandated by OPA 90 as the national response resource system.
 - Backbone of the OSRO Classification system.
 - ~669 OSROs with various classifications
- Publicly Accessible
 - Participation by private industry is voluntary except for classified OSROs, whose participation becomes mandatory when they apply for a classification.
- Produces custom reports and establishes the framework for preparedness assessment visits (PAVs).

Alternate Classification Cities



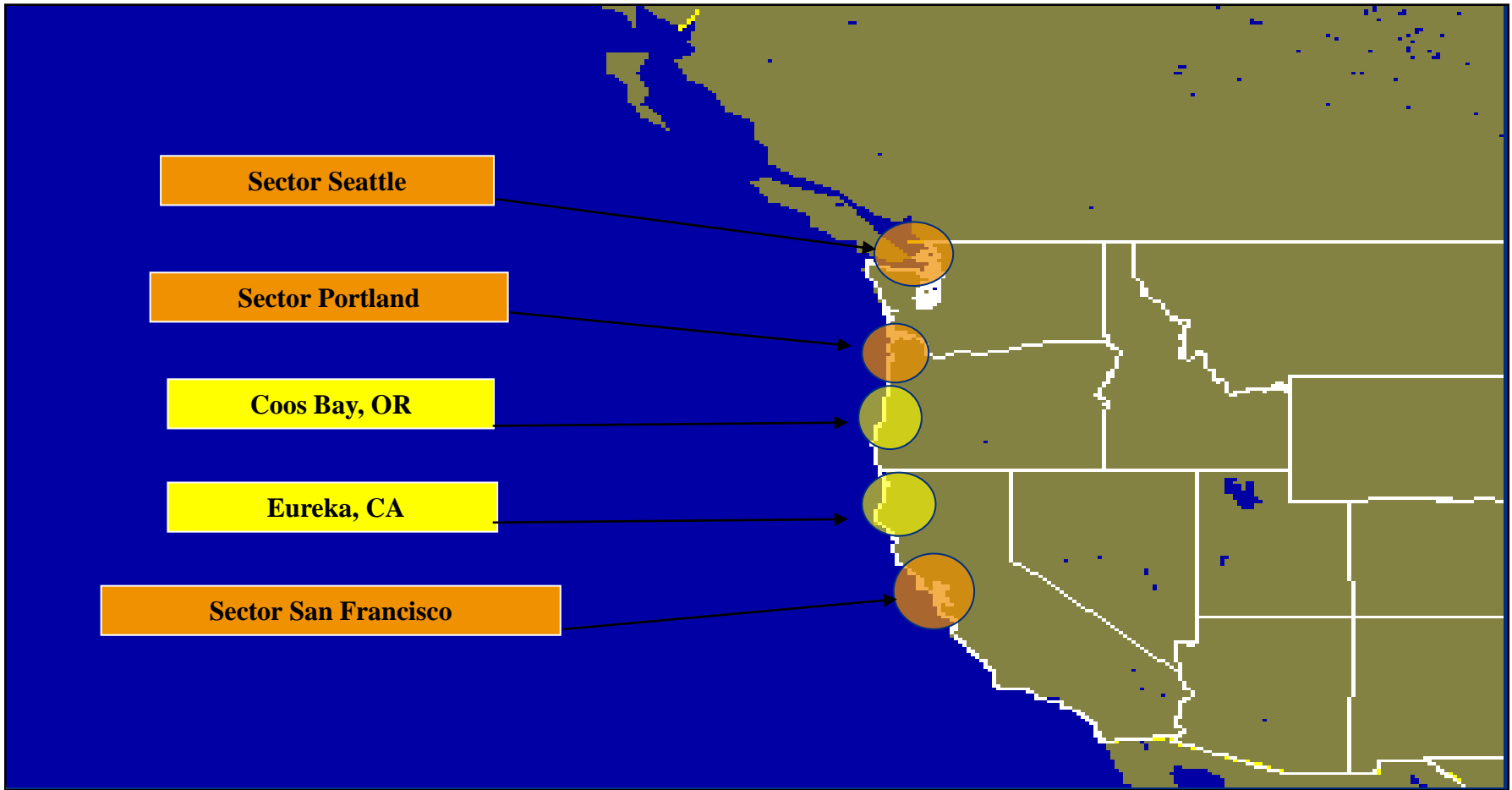
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- A designated geographic location along the U.S. coastline used in addition to or in lieu of a COTP zone for an OSRO classification. (~50 locations)
- The 2001 revision to the Guidelines for the USCG OSRO Classification Program implemented Alternate Classification Cities (ACC) as a replacement to “Alternate Cities.”

Alternate Classification Cities



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Current State



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- The 2013 OSRO Guidelines do not define capability for Group V oils; therefore OSROs are “listed” as Group V capable, not classified.
- Given recent trend of heavy oil/crude production & transportation, limited Government-wide effort focused on response policy/TTP to date.
- The RRI, the national database for response gear, does not differentiate between floating or non-floating oil spill response resources.

Regulatory Scheme



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	Group III – IV (Heavy Oils)	Group V
Basis	Positive buoyancy assumed	Negative buoyancy assumed
Detection	Specific Capabilities Listed: <ul style="list-style-type: none"> •Aerial observations •SCAT Teams •Pollution response personnel 	No Specific Capabilities Listed
Containment	Specific Capabilities Listed: <ul style="list-style-type: none"> •Boom 	No Specific Capabilities Listed
Recovery	Specific Capabilities Listed: <ul style="list-style-type: none"> •Skimmers (amount) •Sorbent Boom (length) •Vacuum trucks (volume) 	No Specific Capabilities Listed
Temporary Storage	Temporary Storage: <ul style="list-style-type: none"> • Positive requirement (3x EDRC) 	No Specific Storage Listed
Appendix	<ul style="list-style-type: none"> •Spill management teams •Shoreline response equipment 	No equivalent

Significant Updates



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- **Nonfloating Oils Classification**
- Enhanced the Preparedness Assessment Visit program
- **Standardized** and **updated** the Dispersant Classification Program
- More robust connection with Vessel Response Plan regulations, PREP Guidelines, and GIUE policies.
- Technical/Administrative updates to all classification programs

Nonfloating Oil Classification



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- Defined Nonfloating Oils: Combination of Heavy Oils (API Gravity 20° or less) and Group V oils
 - Group V oil plan holders required to classify or list requirements IAW regulations
 - Heavy Oil plan holders strongly recommended
- Basis for classification is the nonfloating oil application and procedures.
 - Detection
 - Recovery
 - Temporary Storage Capabilities
 - Environmental Conditions / Considerations

PAVs



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- Considerably expanded upon previous PAV guidance.
 - Tied in past events to demonstrate the importance of PAVs
- Formalized PAV policy, responsibilities, and types.
 - Geared towards the perspective of the OSRO
- Expanded process and criteria to accommodate nonfloating oil classification and previously missed regulatory requirements.

Dispersants



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- Revised Introduction to coincide with existing guidance.
- Revised the term DMP2 to 'Dispersant Mission Planner' to streamline term.
 - Added cites for nontank vessels
- OSROs informed to contact NSFCC while CG-MER assesses new technologies
 - Basic requirements still in place from previous Guidelines

NCP Connectivity



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- Updated chapter to include new classification.
- Clarified NCP related language (PREP, GIUE, Response Plans) throughout the chapter.
- Updated PAV section to align the process with PREP, GIUE and VRP requirements.
- Created MISLE section within Chapter to ensure units are provided credit for PAVs (building up the program)

Technical / Admin



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- Jointly signed by the NSFCC and CG-MER
 - Executive summary
- Several technical and administrative changes made in every classification program.
 - Non-tank vessels
 - SME identified gaps within previous guidance
- Instituted Annual review Process

Next Steps



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- Distribute MSIB to all stakeholders with signed OSRO Guidelines.
 - Maritime Commons (Industry Outreach)
- RRI software update
- Impact to existing industry listing
- Incorporate into MERMAN (USCG's internal MER guidance)
- PAV TTP process
- Evaluate Response System Tools

- Next OSRO Guidelines Review: Commences January 2017

CG-MER MSIB



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Marine Safety Information Bulletin

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MSIB Number: 07-16
Date: April 1, 2016
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Oil Spill Removal Organization Guidelines Update

The purpose of this Bulletin is to announce the update to the Oil Spill Removal Organization (OSRO) Guidelines. The product of a concerted and collaborative effort, the Office of Marine Environmental Response Policy (CG-MER), the National Strike Force Coordination Center (NSFCC), and private/public sector subject matter experts updated these guidelines to address current risks posed by heavy and Group V oils while keeping an eye open for changes on the horizon. The 2016 OSRO Guidelines were signed and published on March 31, 2016.

An integral component of the Coast Guard's marine environmental response mission, updates within the OSRO Guidelines include:

- New annual review requirements for the OSRO Guidelines to be conducted by the NSFCC and CG-MER. This review will take place at the beginning of each calendar year.
- Revised and edited portions of each classification program to either clarify previous language, add context, or remove redundant language.
- Created a new classification in the OSRO Guidelines: Nonfloating Oils classification. The Nonfloating Oil classification meets the regulatory requirements of Group V oils in accordance with the criteria set forth by 33 CFR § 154.1047 and 33 CFR § 155.1052 and the inherent risk of other heavy oil types that may submerge or sink.
- Created the Nonfloating Oil application and procedures to meticulously and qualitatively assess Nonfloating Oil classifications. The application contains pertinent information for owners and operators to appropriately determine what Nonfloating Oil classified OSROs would be best suited for their operations.

Effective on November 30, 2016, all previous Group V OSRO "listings" will be removed from the Response Resource Inventory. Furthermore, all Facility and Vessel response plan holders who may handle, store, or transport Group V oils shall only list Nonfloating Oil classified OSROs or provide the required information in accordance with the regulatory Group V Response Plan Development and Evaluation Criteria. OSROs desiring to apply for the Nonfloating Oil classification can do so now and refer to Chapter 6 in the Guidelines.

OSRO Guidelines may be accessed at:
[Homeport - 2016 OSRO Guidelines](#) and input OSRO Guidelines into the search engine.
Or use the following path – Environmental – Vessel Response Plan Program – What's New?

Any questions regarding this update may be directed to CG-MER's point of contact, LT Brandon Aten at Brandon.J.Aten@uscg.mil or 202-372-2248.

-USCG-

Questions



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Important Links



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- NSFCC website: (Should be updated soon)

- <http://www.uscg.mil/hq/nsfweb/nsf/nsfcc/ops/ResponseSupport/RAB/osroclassifiedguidelines.asp>

- Homeport

- <http://homeport.uscg.mil>

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