

U.S. Department of  
Homeland Security

United States  
Coast Guard



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16450  
24 April 2013  
MER Policy Letter 03-13

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COMDT (CG-MER)

A handwritten signature in blue ink, appearing to read "J. Caplis", written over the printed name.

To : COMLANTAREA (LANT-3R)  
COMPACAREA (PAC-3)  
NSFCC

Subj: MER POLICY LETTER 03-13; OIL SPILL REMOVAL ORGANIZATION (OSRO)  
CLASSIFICATION PROGRAM

Ref: (a) Federal Register, Volume 74, Number 167 (31 August 2009). 33 CFR Parts 154 and  
155, Vessel and Facility Response Plans: 2003 Removal Equipment Requirements  
and Alternative Technology Revisions

1. **PURPOSE.** The purpose of this policy letter is to promulgate new Guidelines for OSRO Classification and to provide interim guidance on the Response Resource Inventory (RRI) pending determination of future courses of action.
2. **ACTION.**
  - a. Area Response and Planning Staffs are requested to make this policy letter and reference (a) known to their District counterparts and Sector Commanders for further dissemination to Regional Response Teams (RRTs) and Area Committees.
  - b. Captains of the Port (COTP) and Officers in Charge of Marine Inspection (OCMI) are encouraged to bring this policy letter to the attention of the maritime industry within their area of responsibility.
  - c. The National Strike Force Coordination Center (NSFCC) should ensure that classified OSROs are advised of the contents of this guidance and the provisions of enclosure (1).
  - d. The Office of Marine Environmental Response (CG-MER) will work with the Spill Control Association of America (SCAA), the Association of Petroleum Industry Cooperative Managers (APICOM), and the American Petroleum Institute (API), to ensure that the guidance contained in this letter is conveyed to their members.
3. **DIRECTIVES AFFECTED.** The Guidelines for the U.S. Coast Guard Oil Spill Removal Organization Classification Program, dated 27 Apr 2001, and the Addendum to the April 2001 Guidelines, dated June 2002, are hereby cancelled.
4. **ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATIONS.** Environmental considerations were examined in the development of this guidance and have been determined to be categorically excluded under current USCG CE #33 from further environmental analysis, in accordance with Section 2.B.2. and Figure 2-1 of the National Environmental Policy Act Implementing Procedures and Policy for Considering Environmental Impacts, COMDTINST

M16475.1 (series). Because this guidance implements, without substantive change, the applicable Coast Guard or other federal agency regulations, procedures, manuals, and other guidance documents, Coast Guard categorical exclusion USCG CE #33 is appropriate.

5. FORMS/REPORTS. None

6. BACKGROUND.

a. In 1996, the Coast Guard published final rules for Tank Vessels and Marine Transportation-related facilities implementing a provision of the Oil Pollution Act of 1990 (OPA90) that required Vessel Response Plans (VRPs) and Facility Response Plans (FRPs).

b. In 1997, in order to accommodate VRP and FRP development and review, the Coast Guard provided for a system of "classifying" OSROs based on the response capability of those OSROs that voluntarily requested classification.

c. The OSRO classification program has been administered by the NSFCC since its inception. The RRI is the backbone of the classification system. OSROs requesting classification submit equipment information to the web-based RRI which uses internal algorithms to determine the appropriate classification for the OSRO.

d. The last revision of the OSRO Guidelines for the U.S. Coast Guard OSRO Classification Program was released in April 2001, followed by an Addendum in June 2002.

7. DISCUSSION. Reference (a) amended VRP and FRP regulations with regard to the use of dispersants and other alternative response technologies. In addition to the existing requirements to maintain a mechanical response capability, owners and operators are now required to establish and maintain, in dispersant pre-authorization zones, a dispersant application capability for all WCD scenarios. Enclosure (1) has been revised to incorporate these new provisions, particularly with regard to dispersant planning for OSROs.

8. GUIDANCE.

a. Enclosure (1) sets forth classification guidelines for mechanical and dispersant providing OSROs. It is important to recognize that: (1) each type of classification can be achieved independent of the other; (2) any classification levels that are achieved are based on planning not performance criteria; and (3) in all cases, participation in the OSRO classification program is voluntary.

b. The Coast Guard will classify OSROs, in accordance with the process described, and will make public a list of classified OSROs and any changes to existing classification levels. Coast Guard COTPs will accept classification by the NSFCC in lieu of a complete list of removal or dispersant application equipment listed in response plans, as indicating that the owner or operator has identified sufficient capacity to meet their planning requirements for MMPD, WCD1, WCD2, and WCD3 discharge scenarios.

c. OSROs wishing to participate in the classification process are to follow the procedures described in enclosure (1). Classified OSROs whose classification status changes for any reason should notify owners or operators, with whom they have been contracted, that the owner or operators' ability to meet his or her planning requirements may be affected.

d. Coast Guard classification of an OSRO does not guarantee the performance of that organization during an oil spill. The Coast Guard reserves the right to withdraw classification if an OSRO fails to maintain the response capabilities it had upon initial

approval.

e. NSFCC should post enclosure (1) to the RRI website. All OSRO classification or RRI administrative questions can be directed to the RRI Administrator.

9. DISCLAIMER. Enclosure (1) describes a collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, an information collection that does not display a currently valid Office of Management and Budget (OMB) control number. The OMB control number for the collection of information described in enclosure (1) is 1625-0102.

10. QUESTIONS. All MER Policy Letters along with other CG-MER guidance documents are posted to the CG-MER portal. Questions concerning this policy letter and/or the program should be directed to the Office of Marine Environmental Response Policy (CG-MER).

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Enclosure: (1) Guidelines for the U.S. Coast Guard Oil Spill Removal Organization  
Classification Program, April 2013

U.S. Department of  
Homeland Security

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# Guidelines for the U.S. Coast Guard Oil Spill Removal Organization Classification Program



April 2013

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## CHAPTER 1. Executive Summary, Background, and Overview

### A. Required Response Plans.

1. Section 4202 of the Oil Pollution Act of 1990 (OPA 90) amended section 311(j) of the Federal Water Pollution Control Act (FWPCA) to require the preparation and submission of response plans by the owners or operators of certain oil-handling facilities and for all vessels defined as “tank vessels” under 46 United States Code 2101 (hereafter referred to as plan holders). Further regulations in 33 Code of Federal Regulations (CFR) 154.1035 and 155.1035, require plan holders that operate within a pre- authorization zone to submit a response plan that includes dispersant capability.
2. Plan holders are required to submit a response plan that identifies and ensures by contract or other approved means (i.e. Letter of Intent), the availability of private personnel and equipment necessary to remove, to the maximum extent practicable, a worst case discharge (WCD), including a discharge resulting from fire or explosion, and to mitigate or prevent a substantial threat of such a discharge.
3. The system for assembling, mobilizing, and controlling response resources is extremely complex, therefore, in order to meet the statutory requirements, each response plan holder must identify the means for accomplishing these tasks.
4. Plan holders that arrange for the services of a Coast Guard-classified oil spill removal organization (OSRO) do not have to list that OSRO’s specific response resources in their plans.

### B. Voluntary Classification Program.

1. The Coast Guard created the voluntary OSRO classification program so that plan holders could simply list OSROs in their response plans rather than providing extensive detailed lists of response resources. If the OSRO is classified by the Coast Guard, it means their capacity has been determined to equal or exceed the response capability needed by the plan holder for regulatory compliance, see 33 CFR 154.1035 and 155.1035.
2. OSROs and plan holders participate in and use the classification program on a strictly voluntary basis. Once an OSRO chooses to participate in the classification program, full compliance is necessary or an OSRO may risk losing their classification status.
3. OSROs are classified based on “core equipment” that they either own or hire under contract. Core equipment includes: boom, estimated daily recovery capacity (EDRC), storage, support equipment (such as response vessels and response personnel), dispersant product, dispersant application platforms, and aerial oil tracking capabilities.
4. Using a Coast Guard-classified OSRO in a response plan does not relieve the plan holder of the responsibility to ensure that specific response needs are met. While classification provides a good indication of an OSRO’s response capability, simply being a Coast Guard-classified OSRO does not guarantee performance during an actual spill.



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C. Classification Guidelines.

1. OPA 90 was intended to develop private sector responsibility for all aspects of oil spill response planning, and the classification process is a component that can determine the realistic response capability of an OSRO. These OSRO guidelines provide plan holders with a gauge in which to determine an OSRO's ability to respond to and recover oil spills of various sizes and to meet specific planning requirements.
2. Identifying a Coast Guard-classified OSRO as part of a facility response plan (FRP) or tank vessel response plan (VRP) does not relieve plan holders of the primary responsibility to ensure that their OSROs are able to respond effectively and to provide the complete range of capability required by the FRP or VRP regulations.
3. While these guidelines specifically apply to OSROs participating in the Coast Guard classification program, the Coast Guard uses the same criteria to evaluate the capability of OSROs identified in response plans that do not participate in the classification program.

D. Purpose.

1. The OSRO classification program was developed to facilitate the preparation and review of FRPs and VRPs by providing a standardized system with which to group response capabilities. Once classified, plan holders are able to list OSROs by name and classification as an alternative to listing extensive resources in their plans. OSRO classification is a strictly voluntary program which plan holders can use for regulatory planning compliance purposes.
2. An OSRO classification does not guarantee the performance of an OSRO, nor does the use of a Coast Guard-classified OSRO in a plan relieve plan holders of their ultimate statutory and regulatory responsibility to ensure the adequacy of the spill response resources identified in a response plan.
3. This instruction also includes guidance on dispersant providing OSROs to align with the 2009 update to 33 CFR 154 and 155. New WCD Tier labels in updated tables and new Alternate Classification Cities (ACC) have been included. Changes made to the 2001 Guidelines as a result of the 2002 Addendum have also been incorporated into this instruction.

## CHAPTER 2. Application Processes and Resource Requirements

### A. Application Process.

1. Any OSRO may voluntarily apply for classification through the Response Resource Inventory (RRI) website, located at: <https://cgri.uscg.mil/logon.aspx?ReturnUrl=%2fdefault.aspx>. Guidance regarding this program may be obtained from:

Commanding Officer  
National Strike Force Coordination Center (NSFCC)  
ATTN: Response Resource Assessment Branch  
1461 North Road Street Elizabeth City, NC 27909-3241  
Tel: (252) 331-6000 / Fax: (252) 331-6012  
Email: [D05-SMB-NSFCC-RRI@uscg.mil](mailto:D05-SMB-NSFCC-RRI@uscg.mil)  
<http://www.uscg.mil/hq/nsfweb/nsf/nsfcc/ops/ResponseSupport/RRAB/osroclassifiedguidelines.asp>

2. The Coast Guard uses standard calculations to determine compliance with equipment standards and response times. Classification is assigned based on the information supplied by each OSRO. Participation in the RRI is mandatory for an OSRO to receive classification. For an application to be accepted, all pertinent RRI data fields must be completed.
3. Using the response times, discharge quantities, and equipment requirements specified in the FRP and VRP regulations, 33 CFR 154.1035, 154.1045, 154.1047, 154 Appendix C, 155.1035, 155.1040, 155.1045, 155.1050, 155.1052, 155 Appendix B, and these guidelines, the NSFCC determines the appropriate classification(s) for each Captain of the Port (COTP) city or ACC requested by an OSRO. After the initial registration and completion of equipment entry into the RRI, contact the NSFCC to request an official letter of classification.

### B. Acceptable Optional Classification.

1. If compliance with the set standards is impractical, an OSRO may request Optional Classification as long as the alternate standard provides an equivalent level of safety and protection from pollution by oil or hazardous material. OSROs should document that their alternate standard is equivalent in their classification request. The request should be submitted in writing to the NSFCC.
2. OSROs may also request approval for alternate travel speeds, per section H. through J.
3. The alternative compliance standards that will be considered are those allowed within the FRP and VRP regulations as outlined in the following table.

Table 2-1: Acceptable Alternative Standards and Regulatory Cites

Category	Section in Response Plan Regulations	
	Facility	Tank Vessels
	33 CFR 154	33 CFR 155
EDRC	Appendix C, Section 6.3	Appendix B, Section 6.3
Travel Speed	Appendix C, Section 2.6	Appendix B, Section 2.6
TSC	Appendix C, Section 9.2	Appendix B, Section 9.2
Boom	Based on ACP	Appendix B, Table 2

C. OSRO Exercises.

1. Both the FRP and VRP regulations require that plan holders conduct annual equipment deployment exercises involving the OSROs listed in their response plans 33 CFR 154.1055 and 155.1060. An OSRO that is listed as the primary response organization in a response plan desiring to obtain and maintain a classification will participate in and keep documentation of these completed exercises.
2. For OSROs using a combination of owned and contracted resources to meet the requirements for classification, exercises should include both categories of resources working together and integrating separate system components provided by multiple OSROs.
3. In addition to equipment deployment, exercises should include mobilization, transportation, and logistics support aspects, especially as they relate to WCD Tier 1 resources.
4. To the maximum extent practicable, OSROs are encouraged to work with plan holders and the local area committees to hold equipment deployment exercises in conjunction with annual spill management team or area exercises. Additionally, OSROs are encouraged to use these exercises as an opportunity to validate response strategies contained in response and contingency plans.

D. Personnel Training.

1. The FRP and VRP regulations require plan holders to ensure that response personnel are trained to perform their jobs as per 33 CFR 154.1050, 155.1055, and 154 Appendix C. The OSRO classification program requires an OSRO to provide similar assurance. OSROs must conduct periodic training to reinforce required knowledge.
2. An OSRO should provide confirmation that it has identified the skills necessary in a response and show that personnel have received the proper training to perform in those areas. Training records and descriptions of the methods in which training is delivered to personnel shall be available for review. An effective response training program should include, but is not limited to, the following:
  - a. Actions to take in accordance with designated job responsibilities.

- b. Occupational Safety and Health Administration (OSHA) requirements outlined in 29 CFR 1910.120.
  - c. Communications.
  - d. Training on specific response equipment identified in the OSRO application.
3. Training records shall be maintained for three years following completion of the training. All records must be available for review during the NSFCC's Preparedness Assessment Verification (PAV).

E. Equipment Maintenance.

1. An OSRO must ensure that response resources listed in its application are inspected periodically and maintained in good operating condition in accordance with the manufacturer's recommendations, best commercial practices, and as per 33 CFR 154.1057 and 155.1062. Furthermore, all inspections and maintenance must be documented and the records maintained for three years. All maintenance records must be available for review during the NSFCC's PAV.

F. Resource Requirements.

1. The number of personnel needed to support a response depends on numerous factors. For the OSRO classification program, the number of personnel required for a classification for each COTP city or ACC is based on the location of resources. During the application process, through the RRI, an OSRO identifies the number of personnel required to mobilize and operate the resources at each of its resource sites. Each site that meets the time requirements for a classification should have its personnel requirements totaled for that classification. If sufficient personnel have been identified by the OSRO that meet the response time requirements and concurrently can deploy and operate all equipment necessary for that level of classification, then an OSRO qualifies for that classification.
2. Resources counted for OSRO classification can be owned or contracted and dedicated or non-dedicated. Since non-dedicated resources may not be available to respond immediately, longer notification and mobilization times are assigned to these resources. FRP and VRP regulations require plan holders to ensure the availability of response resources by contract or other approved means. OSROs must meet these same requirements for all response resources (dedicated, non-dedicated, owned, and non-owned equipment and personnel) that they claim for classification purposes. All contracted equipment should be listed in the RRI by the resource owner prior to an OSRO listing a resource as contracted.
3. In classifying OSROs, the program uses a combination of planning volume capacities, response times, and other information found in FRP and VRP regulations. For the OSRO classification program, the classifications of maximum most probable discharge (MMPD) and WCD Tiers 1, 2, and 3 will be issued.
4. OSROs should ensure that the resource information in the RRI is accurate to maintain classification and service plan holders.

5. A full and up-to-date inventory in the RRI will help COTPs know what response resources are available in their zones. Though not a requirement, it is requested that OSROs enter their full equipment inventory into the RRI not just the minimum needed for classification.

**G. Response Times.**

1. OSROs are required to meet certain response times as per 33 CFR 154.1045, 154.1057(d), and 155.1050. The response times for classification are derived from the regulations and standardized for classification through a series of calculations within the RRI. To receive a classification for a specific COTP city or ACC, an OSRO must ensure that the resources are able to meet the specified response times in that area.
2. The OSRO classification program computes response times by combining the notification times, mobilization times, and travel times of the resource sites used for a specific classification. Response plan regulations require the plan holder to include the time for notification, mobilization, and travel when computing response times (33 CFR 154 Appendix C, paragraph 2.6 and 33 CFR 155 Appendix B, paragraph 2.6). Therefore, the time needed for a resource to move from its primary staging site to a classification point is the sum of the notification, mobilization, and travel times.
3. Mobilization is the time it takes to get the resources assembled and prepared at the staging site. Mobilization begins once notifications are complete and ends when the resources are ready to move off-site. The time to notify and mobilize resources at a site is largely based on how much control the OSRO has over those resources (i.e. dedicated, non-dedicated, owned, and contracted). For this reason, different mobilization times are used for calculating OSRO classifications based on resource status (see table below). Using this table, an OSRO determines the notification/mobilization time for each response resource included in its application, and provides that information on the status of each response resource during the application process. *Note: Full-time personnel are a dedicated resource; part-time personnel are a non-dedicated resource. On-site indicates a 24-hour staffed resource site, as opposed to personnel who have to be recalled. Also, add one half hour to response time to account for the time between the discovery of discharge and the notification to the OSRO.*

Table 2-2: Resource Notification/Mobilization Response Times in Hours

Resource Status	Response Personnel Availability	
	On-Site (OS)	Recall (R)
Owned/Dedicated (O/D)	1	2
Contract or Dedicated (C/D)	1.5	2.5
Owned/Non-dedicated (O/ND)	2.5	3.5
Contract /Non-dedicated (C/ND)	3	4

4. The amount of control an OSRO has over its contracted resources depends on whether the resource is dedicated or non-dedicated. Dedicated resources will have a faster notification and mobilization time than their non-dedicated counterparts that could be committed to other

activities. Likewise, resource sites that are owned and dedicated can mobilize faster than those that are contracted.

5. Travel times are computed using standard speeds and the highway or water distance between an OSRO site and specified geographic locations within the COTP zone. Travel speeds of 35 miles per hour (mph) for land, 5 knots (kts) for water, and 100 kts for aircraft are used for OSRO classification calculations. The distance is divided by the speed to determine the travel time using the equation below. The total response time assigned to each site is the sum of the notification time, mobilization time, and travel time to the geographic point.

$$\text{Travel time} = (\text{Distance between OSRO site and COTP city or ACC}) / \text{Travel Speed}$$

$$\text{Total Response Time} = \text{Notification Time} + \text{Mobilization Time} + \text{Travel Time}$$

#### H. Process for Requesting Alternate Speeds for Vessels.

1. OSRO classifications are based on the planning criteria contained in 33 CFR 154 and 155 which provide a general indication of an OSRO's capabilities based on geographic location and response resources controlled. As discussed in the previous section, response times over water, for classification purposes, are calculated using the planning speed of 5 kts. The speed of 5 kts is a conservative planning criterion that is specified in 33 CFR 154 and 155 and takes into account mobilization time and environmental factors. However, OSROs that can demonstrate that a vessel consistently performs at speeds greater than 5 kts may request that their classifications be determined using an alternative transit speed. Alternate speeds are most likely to apply to large vessels such as OSRVs, tugboats, and barges.
2. OSROs desiring to utilize alternative transit speeds for water transit shall submit their requests in writing to the NSFCC. The requests should specify the individual vessel(s) that the alternate speeds will apply to and will at a minimum include the following documentation:
  - a. Logs and records indicating vessel speed over various routes.
  - b. Charts indicating routes and distance transited.
  - c. Mobilization plan (including personnel recall numbers).
3. Upon concurrence of the NSFCC and the applicable COTP, the NSFCC will factor in the alternative speeds when determining the OSRO's classification for the applicable vessels and COTP zones. If the OSRO has already received a classification, the information will be used to revise that classification.

#### I. Process for Requesting Alternate Speeds for Aircraft.

1. As discussed in section G.5, travel speed for aircraft is set at 100 kts for classification purposes. OSROs that can demonstrate that an aircraft consistently performs at speeds greater than 100 kts can request that their classifications be determined using an alternative transit speed.
2. OSROs desiring to utilize alternative transit speeds for air transit shall submit their requests in writing to the NSFCC. The requests should specify the individual aircraft(s) and COTP(s) that the alternate speeds apply to and include, at a minimum, the following documentation:

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- a. Manufacturer specifications for that aircraft.
  - b. Documented field tests or reports of actual use demonstrating speed capabilities.
3. Upon concurrence of the NSFCC and the applicable COTP, the NSFCC factors in the alternative speeds when determining the OSRO's classification for the applicable aircraft and COTP zones. If the OSRO has already received a classification, the information is used to revise that classification.
  4. As per 33 CFR 154.1045(i)(2)(ii) and 33 CFR 155.1050(k)(2)(ii), if an aircraft is documented in the Dispersant Mission Planner 2 (DMP2), then that aircraft speed may be used without submitting the above documentation. The OSRO should still provide the alternate speed to the NSFCC to be updated in the RRI.

J. Process for Requesting Alternate Speeds for Over the Road Vehicles.

1. No request for alternate over the road speeds will be accepted. 35 mph is the set planning standard for over the road vehicles. The speed is based on external factors such as average speed limits and traffic, so actual mechanical ability does not increase the planning standard.

K. Status Changes in Equipment or Capabilities.

1. Once classified, an OSRO should report any significant changes made to its response resources to the NSFCC and COTP within 72 hours.
  - a. Significant changes are defined as a reduction in the OSRO's classified capacity by a factor of 10% or greater, for a period of 48 hours or longer.
  - b. Additional changes should also be updated in the RRI within 72 hours in the case of moving equipment from one site location to another site or deleting equipment that is no longer functioning that could impact classification.
2. Reductions in OSRO capabilities due to the surging of equipment into another COTP zone during a response will not be grounds for loss of OSRO classification. However, notification of such resource movements should be made immediately to the NSFCC and COTP.
3. For changes in coverage due to planned maintenance that will exceed 48 hours, the OSRO should provide NSFCC and the COTP(s) with as much advance prior notice as possible along with a description of the reduction in capability and any proposed mitigating measures.
4. The NSFCC reviews any mitigating measures submitted by an OSRO, and either approves or proposes additional measures back to the OSRO. The NSFCC, in consultation with the Coast Guard's Office of Marine Environmental Response Policy (CG-MER), determines if the OSRO needs to provide additional mitigating measures based on the amount of time the equipment is to be out of service, the expected decrease in coverage, and the areas impacted. Once mitigating measures are approved, the NSFCC coordinates notifications to affected COTPs. Any mitigating measures implemented by an OSRO should commence prior to the start of the planned gap. If the mitigating measures do not meet the requirements for classification, then that OSRO loses its dispersant classification until it restores full coverage.

## CHAPTER 3. Description of Classifications for Mechanical OSROs

### A. Overview.

1. OSROs are classified based on the location of response resources and an assessment of the ability to mobilize those resources to the COTP city or ACC. There are equipment standards and response times specific to each operating area within a COTP zone. Additional requirements are outlined for the Prince William Sound, Alaska COTP zone and shallow water environments. This chapter also discusses exercises, personnel training, and equipment maintenance specific to the OSRO classification program for Mechanical OSROs.

### B. Resource Requirements.

1. Core resources are separated into five categories: protective boom; EDRC containment boom; temporary storage capacity (TSC); response vessels; and personnel. Both protective and containment boom are measured in feet, EDRC is measured in barrels per day (bbls/day), and TSC is measured in barrels (bbls).

### C. Protective Boom.

1. VRP regulations require that a plan holder have a specific amount of boom available for shoreline protection purposes for MMPDs and WCDs per 33 CFR 155, Appendix B. For classification purposes, it is assumed that the OSRO has both vessel and facility clients. Since the protective boom requirements for vessel response plan holders are more restrictive and specific, these requirements are used for OSRO classification per 33 CFR 155 Appendix B, paragraph 5.6.
2. If an OSRO certifies that it only serves facility customers, it can submit, in writing to the NSFCC, a request to base its protective boom requirements on the amount specified in Area Contingency Plans (ACPs) and FRP for the relevant COTP zone in accordance with 33 CFR 154 Appendix C, paragraph 5.6.

### D. EDRC and Containment Boom.

1. EDRC, containment boom, and response vessels are interrelated for OSRO classifications. For planning purposes, EDRC credit is counted only toward an OSRO's classification if there is, at a minimum, 300 feet of containment boom available to be deployed in the applicable operating area to complete each skimming system.
2. Per FRPs and 33 CFR 154.1045, an OSRO must have 1,000 feet of containment boom in addition to the 300 feet per skimming system required to complete a skimming system. Response vessels need to be identified to support the recovery devices that also meet the specific FRP and VRP time requirements outlined in these guidelines.
3. At a minimum, OSROs should use the boom amounts recommended by a skimming system's manufacturer, usually about 300 feet. If the skimmer is designed in a way that containment boom needed is less than 300 feet, an OSRO can request an Acceptable Optional Classification in writing from the NSFCC for the amount that is recommended by the manufacturer.



E. Temporary Storage Capacity (TSC).

1. An OSRO must identify TSC equaling twice the EDRC included in a classification application as required by 33 CFR 154 Appendix C, paragraph 9.2 and 33 CFR 155 Appendix B, paragraph 9.2. TSC and EDRC are interrelated. An OSRO's classification is limited by the lowest-rated component of the recovery system. For example, if an OSRO has 10,000 bbls/day EDRC but only has available 14,000 bbls TSC, then its recovery capacity is limited to 7,000 bbls/day (one half of the available TSC capability).
2. Non-dedicated TSC, for the purposes of this classification program, includes any TSC supplied by tank barge and mobile storage. Tank barges and mobile storage are assumed to be engaged in transporting oil between various locations and full of oil half of the time. Therefore, tank barges and mobile storage are only fully capable of supplying the total amount of TSC required half of the time. As a result, non-dedicated temporary storage would normally not qualify for the requirement specified by 33 CFR 154.1045(g), which states, response equipment must mobilize within two hours for a MMPD and WCD1 classification. As an exception, the USCG classification program allows non-dedicated tanker barges and mobile storage (i.e., vacuum trucks) to qualify for the MMPD and WCD1 mobilization if the non-dedicated TSC is provided at a 2:1 ratio.
3. Use dedicated mobilization offset times for non-dedicated TSC resources if the non-dedicated TSC resources are provided at two times the TSC requirement using mutually exclusive assets, also known as a 2:1 ratio. This exception is only available to tank barges and mobile storage and is not available to fixed storage. Mobile storage is limited to 45% of the total TSC and fixed storage is limited to 35% of the total TSC.
4. Fixed storage tanks ashore can be identified to meet the TSC requirements in limited circumstances. They are accepted only for OSRO classifications covering the rivers/canals, Great Lakes, and inland operating areas. They are allowed for up to 35% of an OSRO's TSC provided that the OSRO certifies that it can transport recovered oil to the fixed tanks ashore and sustain the required EDRC. Shore side fixed storage tanks are not allowed in the near shore, offshore, or open ocean operating areas.
5. Vacuum trucks are limited to a maximum of 45% of the total TSC in the rivers/canals, Great Lakes, and inland operating areas. They are not permitted for EDRC and TSC credit in the near shore, offshore, and open ocean operating areas. An OSRO may however provide proper documentation from the applicable COTP authorizing on-deck vehicle(s) transport of EDRC and TSC capability for all operating areas. All vacuum trucks receiving EDRC credit require 300 feet of containment boom as part of the system.

F. Response Vessels.

1. Response vessels are integral to every response. Vessels intended for response services should be clearly identified in the RRI. Although response vessels are not calculated programmatically into a classification, the NSFCC reviews available response vessels. If a shortfall is perceived, further discussion with the OSRO is warranted before a classification is considered.

2. Only response vessels that meet the response time requirements by tier as outlined in these guidelines will be considered. All response vessels identified must meet applicable Coast Guard regulations and policy guidelines (e.g., navigation lights, safety equipment, life vests).

G. MMPD and WCD Tier 1 Classification.

1. Only resources located at equipment sites capable of being mobilized and en route to the scene of a spill within two hours of notification are counted toward MMPD and WCD1 classifications. Because of the potential for non-dedicated resources to be committed to other functions, only dedicated resources are presumed to be able to mobilize within these time requirements.

H. WCD Tier 2 and WCD Tier 3 Classification.

1. Owned, contracted, dedicated, and non-dedicated equipment is allowed for WCD2 and WCD3 classification.

I. Dedicated vs. Non-dedicated Resources.

1. Since non-dedicated tank barges used for TSC credit may operate significant distances from their classification resource sites an OSRO must further ensure the availability of non-dedicated barges by contract or other approved means in quantities equal to twice what the OSRO requires of the dedicated resources.
2. FRP and VRP regulations specify the quantity of resources required for specific planning volumes. The requirements are categorized as the MMPD and WCD (see below for planning volumes), WCD is further divided into Tiers 1, 2, and 3. MMPD and WCD are based on a calculation using a facility's largest foreseeable oil discharge or a tank vessel's cargo volume.

Table 3-1: Planning Volumes for Discharge Categories

Category	Facility	Tank Vessel
MMPD*	1,200 bbls or 10% of WCD	2,500 BBLS OR 10% OF WCD
WCD*	Largest foreseeable oil discharge in adverse weather conditions	Entire loss of oil cargo

\*Defined in 33 CFR 154.1020 and 155.1020

3. Manufacturers design boom, oil recovery devices, and TSC equipment with certain operating areas in mind. In the response plan regulations these operating areas are identified as rivers/canals, Great Lakes, inland, near shore, offshore, and open ocean. The OSRO classification program classifies OSROs based on these areas. The section on Specific Classification Standards by Operating Area lists specific requirements for boom, EDRC, and TSC for each of these areas. To receive an MMPD, WCD1, WCD2, or WCD3 classification, an OSRO must meet all boom, EDRC, and TSC requirements for the classification. Classification is determined independently for each operating area. See the following tables for more details.

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Table 3-2: Boom Amounts in Feet for OSRO Classifications

Area	Configuration	MMPD	WCD1	WCD2	WCD3
Rivers/Canals	Protective	4,000	25,000	25,000	25,000
Great Lakes	Protective	6,000	30,000	30,000	30,000
Inland	Protective	6,000	30,000	30,000	30,000
Near shore	Protective	8,000	30,000	30,000	30,000
Offshore	Protective	8,000	15,000	15,000	15,000
Open Ocean	Protective	0	0	0	0

Table 3-3: EDRC Amounts in Barrels per Day for OSRO Classifications

Area	MMPD	WCD1	WCD2	WCD3
Rivers/Canals	1,200	1,875	3,750	7,500
Great Lakes	1,200	6,350	12,500	25,000
Inland	1,200	12,500	25,000	50,000
Near shore	1,200	12,500	25,000	50,000
Offshore	1,200	12,500	25,000	50,000
Open Ocean	0	0	0	0

Table 3-4: TSC Amounts in Barrels for OSRO Classifications

Area	MMPD	WCD1	WCD2	WCD3
Rivers/Canals	2,400	3,750	7,500	15,000
Great Lakes	2,400	12,500	25,000	50,000
Inland	2,400	25,000	50,000	100,000
Near shore	2,400	25,000	50,000	100,000
Offshore	2,400	25,000	50,000	100,000
Open Ocean	2,400	25,000	50,000	100,000

J. Response Times.

1. Due to the respective differences in FRP and VRP regulations, the Coast Guard's OSRO classification program uses two major categories for response times, one for facilities and one for tank vessel. A summary table of response times is listed on the next page. *Note: If a COTP zone contains a higher volume port, then response times for mechanical OSRO classification is more stringent.*

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Table 3-5: Response Times in Hours for Containment Boom, EDRC, and TSC Resources

<b>Area</b>	<b>Facility or Tank Vessel</b>	<b>MMPD</b>	<b>WCD1</b>	<b>WCD2</b>	<b>WCD3</b>
Rivers/Canals	Facility	12	12	36	60
	Tank Vessel	24	24	48	72
	Facility Higher Volume Ports	6	6	30	54
	Tank Vessel Higher Volume Ports	12	12	36	60
Great Lakes	Facility	6	12	36	60
	Tank Vessel	12	18	42	66
	Facility Higher Volume Ports	N/A	N/A	N/A	N/A
	Tank Vessel Higher Volume Ports	N/A	N/A	N/A	N/A
Inland	Facility	12	12	36	60
	Tank Vessel	24	24	48	72
	Facility Higher Volume Ports	6	6	30	54
	Tank Vessel Higher Volume Ports	12	12	36	60
Near shore	Facility	12	12	36	60
	Tank Vessel	24	24	48	72
	Facility Higher Volume Ports	6	6	30	54
	Tank Vessel Higher Volume Ports	12	12	36	60
Offshore	Facility	12	12	36	60
	Tank Vessel	24	24	48	72
	Facility Higher Volume Ports	6	6	30	54
	Tank Vessel Higher Volume Ports	12	12	36	60
Open Ocean	Facility	12	12	36	60
	Tank Vessel	24	24	48	72
	Facility Higher Volume Ports	6	6	30	54
	Tank Vessel Higher Volume Ports	12	12	36	60

CHAPTER 4. Specific Classification Standards by Operating Area

A. Rivers and Canals.

1. Summarized in the following table are the equipment standards and maximum response times for classifying OSROs for a planned response to spills in a river/canal operating area. All equipment to be used in this area must be capable of operating in 1-foot wave heights.

Table 4-1: Equipment Standards and Response Times for the Rivers/Canals Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours)	Tank Vessel Response Times (hours)
<b>MMPD (1,200 bbls/day recovery)</b>					
4,000	1,000 plus 300 per skimming system	1,200	2,400	6 for higher volume ports	12 for higher volume ports
				12 for all other locations	24 for all other locations
<b>WCD1 (1,875 bbls/day recovery)</b>					
25,000	1,000 plus 300 per skimming system	1,875	3,750	6 for higher volume ports	12 for higher volume ports
				12 for all other locations	24 for all other locations
<b>WCD2 (3,750 bbls/day recovery)</b>					
25,000	1,000 plus 300 per skimming system	3,750	7,500	30 for higher volume ports	36 for higher volume ports
				36 for all other locations	48 for all other locations
<b>WCD3 (7,500 bbls/day recovery)</b>					
25,000	1,000 plus 300 per skimming system	7,500	15,000	54 for higher volume ports	60 for higher volume ports
				60 for all other locations	72 for all other locations

- a. Boom properties must include the following:
  - (1) Boom height (draft plus freeboard) (inches) = 6–18.
  - (2) Reserve buoyancy-to-weight ratio = 2:1.
  - (3) Total tensile strength (lbs) = 4,500.
  - (4) Skirt fabric tensile strength (lbs) = 200.
  - (5) Skirt fabric tear strength (lbs) = 100.

B. Great Lakes.

1. Summarized in the following table are the minimum equipment standards and maximum response times for classifying OSROs for a planned response to spills in the Great Lakes operating area. All equipment to be used in this operating area must be capable of operating in 4-foot wave heights.

Table 4-2: Equipment Standards and Response Times for the Great Lakes Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours)	Tank Vessel Response Times (hours)
<b>MMPD (1,200 bbls/day recovery)</b>					
6,000	1,000 plus 300 per skimming system	1,200	2,400	6	12
<b>WCD1 (6,250 bbls/day recovery)</b>					
30,000	1,000 plus 300 per skimming system	6,250	12,500	12	18
<b>WCD2 (12,500 bbls/day recovery)</b>					
30,000	1,000 plus 300 per skimming system	12,500	25,000	36	42
<b>WCD3 (25,000 bbls/day recovery)</b>					
30,000	1,000 plus 300 per skimming system	25,000	50,000	60	66

- a. Boom properties must include the following:
  - (1) Boom height (draft plus freeboard) (inches) = 18–42.
  - (2) Reserve buoyancy-to-weight ratio = 2:1.
  - (3) Total tensile strength (lbs) = 15,000–20,000.
  - (4) Skirt fabric tensile strength (lbs) = 300.
  - (5) Skirt fabric tear strength (lbs) = 100.

C. Inland.

1. Summarized in the following table are the minimum equipment standards and maximum response times for classifying OSROs for the planned response to spills in the inland operating area. All equipment to be used in this operating area must be capable of operating in 3-foot wave heights.

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Table 4-3: Equipment Standards and Response Times for the Inland Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours)	Tank Vessel Response Times (hours)
<b>MMPD (1,200 bbls/day recovery)</b>					
6,000	1,000 plus 300 per skimming system	1,200	2,400	6 for higher volume ports	12 for higher volume ports
				12 for all other locations	24 for all other locations
<b>WCD1 (12,500 bbls/day recovery)</b>					
30,000	1,000 plus 300 per skimming system	12,500	25,000	6 for higher volume ports	12 for higher volume ports
				12 for all other locations	24 for all other locations
<b>WCD2 (25,000 bbls/day recovery)</b>					
30,000	1,000 plus 300 per skimming system	25,000	50,000	30 for higher volume ports	36 for higher volume ports
				36 for all other locations	48 for all other locations
<b>WCD3 (50,000 bbls/day recovery)</b>					
30,000	1,000 plus 300 per skimming system	50,000	100,000	54 for higher volume ports	60 for higher volume ports
				60 for all other locations	72 for all other locations

- a. Boom properties must include the following:
- (1) Boom height (draft plus freeboard) (inches) = 18–42.
  - (2) Reserve buoyancy-to-weight ratio = 2:1.
  - (3) Total tensile strength (lbs) = 15,000–20,000.
  - (4) Skirt fabric tensile strength (lbs) = 300.
  - (5) Skirt fabric tear strength (lbs) = 100.

D. Near Shore.

1. Summarized in the following table are the minimum equipment standards and maximum response times for classifying OSROs for the planned response to spills in the near shore operating area. With the exception of shoreline protection boom, all equipment to be used in this operating area must be capable of operating in 6-foot wave heights.

Table 4-4: Equipment Standards and Response Times for the Near Shore Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours)	Tank Vessel Response Times (hours)
<b>MMPD (1,200 bbls/day recovery)</b>					
8,000	1,000 plus 300 per skimming system	1,200	2,400	6 for higher volume ports	12 for higher volume ports
				12 for all other locations	24 for all other locations
<b>WCD1 (12,500 bbls/day recovery)</b>					
30,000	1,000 plus 300 per skimming system	12,500	25,000	6 for higher volume ports	12 for higher volume ports
				12 for all other locations	24 for all other locations
<b>WCD2 (25,000 bbls/day recovery)</b>					
30,000	1,000 plus 300 per skimming system	25,000	50,000	30 for higher volume ports	36 for higher volume ports
				36 for all other locations	48 for all other locations
<b>WCD3 (50,000 bbls/day recovery)</b>					
30,000	1,000 plus 300 per skimming system	50,000	100,000	54 for higher volume ports	60 for higher volume ports
				60 for all other locations	72 for all other locations

a. Boom properties must include the following:

- (1) Boom height (draft plus freeboard)(inches) =  $\geq 42$  containment;  $\geq 18$  shoreline protection.
- (2) Reserve buoyancy-to-weight ratio = 3:1 to 4:1 containment;  $> 2:1$  shoreline protection.
- (3) Total tensile strength (lbs) =  $> 20,000$  containment;  $> 15,000$  shoreline protection.
- (4) Skirt fabric tensile strength (lbs) = 500 containment;  $> 300$  shoreline protection.
- (5) Skirt fabric tear strength (lbs) = 125 containment;  $> 100$  shoreline protection.

**E. Offshore.**

1. Summarized in the following table are the minimum equipment standards and maximum response times for classifying OSROs for the planned response to spills in the offshore operating area. All equipment to be used in this operating area must be capable of operating in 6-foot wave heights.



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Table 4-5: Equipment Standards and Response Times for the Offshore Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours)	Tank Vessel Response Times (hours)
<b>MMPD (1,200 bbls/day recovery)</b>					
8,000	1,000 plus 300 per skimming system	1,200	2,400	6 for higher volume ports	12 for higher volume ports
				12 for all other locations	24 for all other locations
<b>WCD1 (12,500 bbls/day recovery)</b>					
15,000	1,000 plus 300 per skimming system	12,500	25,000	6 for higher volume ports	12 for higher volume ports
				12 for all other locations	24 for all other locations
<b>WCD2 (25,000 bbls/day recovery)</b>					
15,000	1,000 plus 300 per skimming system	25,000	50,000	30 for higher volume ports	36 for higher volume ports
				36 for all other locations	48 for all other locations
<b>WCD3 (50,000 bbls/day recovery)</b>					
15,000	1,000 plus 300 per skimming system	50,000	100,000	54 for higher volume ports	60 for higher volume ports
				60 for all other locations	72 for all other locations

a. Boom properties must include the following:

- (1) Boom height (draft plus freeboard)(inches) =  $\geq 42$  containment;  $\geq 18$  shoreline protection.
- (2) Reserve buoyancy-to-weight ratio = 3:1 to 4:1 containment;  $> 2:1$  shoreline protection.
- (3) Total tensile strength (lbs) =  $> 20,000$  containment;  $> 15,000$  shoreline protection.
- (4) Skirt fabric tensile strength (lbs) = 500 containment;  $> 300$  shoreline protection.
- (5) Skirt fabric tear strength (lbs) = 125 containment;  $> 100$  shoreline protection.

F. Open Ocean.

1. Summarized in the following table are the minimum equipment standards and maximum response times for classifying OSROs for the planned response to spills in the open ocean operating area. All equipment to be used in this operating area must be capable of operating in 6-foot wave heights.

Table 4-6: Equipment Standards and Response Times for the Open Ocean Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours)	Tank Vessel Response Times (hours)
<b>MMPD (1,200 bbls/day recovery)</b>					
No requirements	1,000 plus 300 per skimming system	1,200	2,400	6 for higher volume ports	12 for higher volume ports
				12 for all other locations	24 for all other locations
<b>WCD1 (12,500 bbls/day recovery)</b>					
No requirements	1,000 plus 300 per skimming system	12,500	25,000	6 for higher volume ports	12 for higher volume ports
				12 for all other locations	24 for all other locations
<b>WCD2 (25,000 bbls/day recovery)</b>					
No requirements	1,000 plus 300 per skimming system	25,000	50,000	30 for higher volume ports	36 for higher volume ports
				36 for all other locations	48 for all other locations
<b>WCD3 (50,000 bbls/day recovery)</b>					
No requirements	1,000 plus 300 per skimming system	50,000	100,000	54 for higher volume ports	60 for higher volume ports
				60 for all other locations	72 for all other locations

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- a. Boom properties must include the following:
  - (1) Boom height (draft plus freeboard) (inches) =  $\geq 42$ .
  - (2) Reserve buoyancy-to-weight ratio = 3:1 to 4:1.
  - (3) Total tensile strength (lbs) =  $> 20,000$ .
  - (4) Skirt fabric tensile strength (lbs) = 500.
  - (5) Skirt fabric tear strength (lbs) = 125.

G. Shallow Water Requirements.

- 1. Depending on the operating area, a certain percentage of OSRO resources must be capable of operating in waters of 6 feet or less as required by 33 CFR 154.1045 and 155.1050 (see table below). Equipment must be identified in an OSRO's application to meet this requirement.

Table 4-7: Percentage of Response Equipment Capable of Operating in Shallow Waters

<b>Area</b>	<b>Facility</b>	<b>Tank Vessel</b>
Rivers/Canals	20	20
Great Lakes	20	20
Inland	20	20
Near shore	20	20
Offshore	10	10
Open Ocean	None	None

H. Prince William Sound Classification.

- 1. The FRP and VRP regulations establish more stringent planning criteria for owners and operators of tank vessels loading cargo at a facility permitted under the Trans-Alaska Pipeline Authorization Act. OSROs intending to respond in the Prince William Sound, Alaska COTP zone also are classified to that standard. Additional requirements concerning prepositioned equipment caches are in 33 CFR 154 Subpart G and 33 CFR 155 Subpart E.

## CHAPTER 5. Description of Classifications for Dispersant Providing OSROs

### A. Introduction.

1. Dispersant providing OSROs are classified based on their ability to apply set volumes of surface dispersant within set time frames to the furthest 50 nautical miles (NM) offshore areas within each COTP zone or ACC. This document provides guidance to OSROs concerning how to calculate the amounts of dispersant that can be provided by aerial and vessel spray assets and the criteria for meeting the other regulatory compliance requirements.
2. Core resources are separated into four categories: dispersant product; effective daily application capacity (EDAC); dispersant application platform; and aerial oil tracking or application capabilities.
3. Based on 33 CFR 154.1020 and 155.1020, OSRO dispersant classification levels are evaluated using the DMP2 calculator, a joint government/industry developed computer application that estimates EDAC for dispersant application systems. DMP2 is a software program that can be downloaded from:  
[http://response.restoration.noaa.gov/topic\\_subtopic\\_entry.php?RECORD\\_KEY\(entry\\_subtopic\\_topic\)=entry\\_id,subtopic\\_id,topic\\_id&entry\\_id\(entry\\_subtopic\\_topic\)=552&subtopic\\_id\(entry\\_subtopic\\_topic\)=8&topic\\_id\(entry\\_subtopic\\_topic\)=1](http://response.restoration.noaa.gov/topic_subtopic_entry.php?RECORD_KEY(entry_subtopic_topic)=entry_id,subtopic_id,topic_id&entry_id(entry_subtopic_topic)=552&subtopic_id(entry_subtopic_topic)=8&topic_id(entry_subtopic_topic)=1).

### B. Response Plan Requirements.

1. VRP and FRP regulations, specifically, 33 CFR 155.1035 and 33 CFR 154.1035, require a plan holder operating in any inland, near shore, or offshore area with pre-authorization for dispersant use to be able to apply enough dispersant to meet a WCD or the requirements in 33 CFR 154.1045(i) or 33 CFR 155.1050(k), whichever is the lesser amount. The dispersant identified must be of a type listed on the National Oil and Hazardous Substances Pollution Contingency Plan Product Schedule (33 CFR 155.1050 (d)(2)(i) and 33 CFR 154.1045(i)(2)(i)). The plan must identify: specific dispersant application platforms and payloads; the primary dispersant staging site for each dispersant application platform; the platform type; resource provider; location; dispersant stockpiles and location; and trained personnel necessary to continue operation of the equipment and staff the oil spill removal organization and spill management team for the first seven days of the response (33 CFR 155.1035 and 33 CFR 154.1035).
2. According to 33 CFR 154.1035(b)(3)(vi)(D), if an OSRO has been evaluated by the Coast Guard and has received a classification, then a plan-holder may reference the classified OSRO in their response plan instead of listing out all of the required dispersant resources.

### C. Tier 1, 2 and 3 Worst Case Discharge (WCD) Classifications.

1. Dispersant classifications are categorized by WCD Tiers 1, 2, and 3. The classifications are respectively labeled as WCD1, WCD2, and WCD3. The dispersant classifications can be achieved independently of each other and each classification is determined separately for each COTP zone or ACC. The plan holder can then contract with multiple OSROs to fulfill their tier 1, 2, and 3 requirements.

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2. WCD1: To qualify for the WCD1 classification, an OSRO must be able to commence dispersant operations within seven hours of the decision by the Federal On-Scene Coordinator (FOSC). The seven hour dispersant commencement requirement can be waived if the OSRO can demonstrate the ability to apply 8,250 gallons (Gulf Coast region) or 4,125 gallons (All other US regions) within 12 hours. To get credit under the waiver for WCD1 classification, all 8,250 gallons (Gulf Coast region) or 4,125 gallons (All other U.S. regions) of dispersant must arrive at the OSRO selected primary staging site within seven hours of the FOSC's decision to use dispersants or prior to the arrival of the first dispersant providing platform. Dispersant-dedicated aerial oil tracking resources must be capable of being on-scene (50 NM offshore) within seven hours.
3. WCD2: To qualify for the WCD2 classification, an OSRO must be able to apply 23,375 gallons of dispersants in a 12-hour window within 36 hours of the FOSC's decision to use dispersants. For WCD2, planners can estimate the dispersant timeframe to begin at hour 24 and end at hour 36. To get credit for classification, 11,687 gallons of dispersant must arrive at the OSRO selected primary staging site within 24 hours of the FOSC's decision to use dispersants and the remaining 11,688 gallons must arrive at the primary staging site within 30 hours. Aerial oil tracking resources must be capable of being on-scene (50 NM offshore) within 24 hours of the FOSC's decision to use dispersants.
4. WCD3: To qualify for the WCD3 classification, an OSRO must be able to apply 23,375 gallons of dispersants in a 12 hour window within 60 hours of the FOSC's decision to use dispersants. For WCD3, planners can estimate the dispersant application timeframe to begin at hour 48 and end at hour 60. To get credit for classification, all 23,375 gallons of dispersant must arrive at the OSRO selected primary staging site within 48 hours of the FOSC's decision to use dispersants. Aerial oil tracking resources must be capable of being on-scene (50 NM offshore) within 48 hours of the FOSC's decision to use dispersants.
5. WCD1, 2, and 3: To qualify for all dispersant classifications, an OSRO must meet the total requirements for EDAC and response times as listed in the table in paragraph E.
6. Dispersant application requirements assume 12 hours of daylight in each tier period as a planning standard. For independent classifications, OSROs must be able to apply the EDAC for each tier within a 12 hour period.

D. FOSC Dispersant Decision.

1. 33 CFR 155.1050(k)(1) and 33 CFR 154.1045(i)(1) state that "Dispersant response resources must be capable of commencing dispersant application operations at the site of a discharge within seven hours of the decision of the FOSC to use dispersants." For planning and classification purposes, it is assumed that the FOSC's decision to use dispersants will occur at the time of spill notification. Therefore, an OSRO has seven hours to move dispersant stockpiles and commence dispersant operations.

E. Effective Daily Application Capacity (EDAC).

1. EDAC is the estimated amount of dispersant that can be applied to a discharge by an application system or multiple application systems, given the availability of supporting dispersant stockpiles. As per the regulations, EDAC is calculated for responding to a spill at

the furthest 50 NM point offshore in the COTP zone from the staging or home airport. DMP2 calculates EDAC by evaluating the following primary categories: aircraft and vessel delivery systems and payloads, the location (home base) of each identified platform, OSRO selected primary staging airports, application pattern, and any other input parameters specified.

2. For dispersant application platforms not detailed in the DMP2, or for changes to listed values, adequacy of performance criteria must be documented by presentation of independent evaluation materials (33 CFR 154.1045(i)(2)(ii)) and provided to the NSFCC. The EDAC requirements are listed in the table below and can be found in 33 CFR 154.1045(i) and 33 CFR 155.1050(k).

Table 5-1: Tiers for Effective Daily Application Capacity (EDAC)

Tiers	Response time for completed application (hours)	Dispersant application/Oil treated in gallons (Gulf Coast)	Dispersant application: Oil treated in gallons (All other U.S.)
Tier 1	12	8,250/165,000	4,125/82,500
Tier 2	36	23,375/467,000	23,375/467,000
Tier 3	60	23,375/467,000	23,375/467,000
Totals	60	55,000/1,100,000	50,875/1,017,500

3. For Tier 1, dispersant operations must commence at the site of a discharge within seven hours of the FOSC's decision to use dispersants. However, the seven hour dispersant commencement requirement can be waived if an OSRO can demonstrate its ability to fully apply 8,250 gallons of dispersant in the Gulf Coast or 4,125 gallons of dispersant at all other U.S. coastal areas within twelve hours. EDAC counted towards Tier 1 will be de-rated through the DMP2 calculator by completing the cascade information in section 3 on the application calculation page. An adjusted EDAC will be based on how many hours the asset has available after cascading to the staging airport and how many sorties can be fully or partially completed. Aircraft and vessel platforms will observe 12 hour daytime operational periods during Tier 2 and Tier 3 dispersant operations.
4. Mobilization times for dispersant platforms are added in for EDAC calculations. For dispersant applying aircraft, OSROs shall use the time specified in their contract with the aircraft to determine mobilization time. An attestation letter stating the times that the contracted aircraft can mobilize must be provided to the NSFCC for review. Actual contracts must be available for review by the NSFCC during PAVs. For vessels, OSROs shall apply the times as listed in the table in paragraph (M)(3).
5. If there are additional dispersant quantities that exceed a Tiers' EDAC requirement, credit the excess dispersant quantities towards meeting the next Tiers' EDAC requirements. For example, if an OSRO is trying to qualify for WCD2 and WCD3 classifications and can apply 30,000 gallons of dispersants to the site in 36 hours, then 23,375 gallons will go towards the WCD2 classification and the remaining 6,625 gallons will be applied towards the WCD3 classification.

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F. Location of Resources.

1. 33 CFR 155.1035 and 33 CFR 154.1035 require plans to provide dispersant application platform locations, stockpile locations, and staging site locations. OSROs must enter these locations into the RRI.

G. Captain of the Port Zones.

1. COTP zones and Marine Safety Unit (MSU) zones shall be based on the zones described in 33 CFR 3.05-10 through 33 CFR 3.85-10.

H. Travel Time.

1. The standard speeds used for dispersant classifications are the same as those used for mechanical classifications for calculating travel time. Travel over water is calculated at 5 kts and travel over land is calculated at 35 mph as per 33 CFR 154, Appendix C and 33 CFR 155 Appendix B. Actual land and air routes are used and not a straight line between the staging and response locations.
2. Calculate aircraft speed for the transport of dispersant stockpiles at 100 kts, based on average speeds including delays, preparation time, and layovers. Aircraft speed used for calculating EDAC are designated in the DMP2 or, if an OSRO adds a new aircraft to the DMP2 system, then an alternate speed request should be submitted to the NSFCC. With valid documentation, it is possible for an OSRO to request higher aircraft or vessel transit speeds for dispersant stockpile movement. The specific process for requesting alternate speeds is described in Chapter 2, section H. through I.

I. Dispersant Application Platform.

1. Dispersant application platforms must be capable of delivering and applying dispersant on a discharge. At least 50 percent of each EDAC tier requirement must be achieved through the use of fixed wing aircraft application platforms.

J. American Society for Testing and Materials (ASTM) Standards.

1. All dispersant application personnel must be trained in and capable of applying dispersants as outlined in ASTM F1413-07: "Standard Guide for Oil Spill Dispersant Application Equipment: Boom and Nozzle Systems" as per 33 CFR 154.1045(i)(2)(iii).
2. Boom and Nozzle dispersant application systems must be capable of applying dispersants in accordance with ASTM F1413-07.
  - a. Minimum Equipment Performance Specifications as per ASTM F1413-07 include:
    - (1) Target Dosage: Dispersant spray equipment must provide a dispersant dosage between 2-10 gallons per acre. Five gallons per acre is the standard used for determining EDAC.
    - (2) Droplet Size Distribution: The droplet size distribution of the dispersant reaching the target shall have a Volume Median Diameter (VMD) of 300-500µm.

- (3) **Maximum Delivery Variation Over Swath Width:** The equipment shall be capable of delivering dispersant with a maximum delivery variance of 10 percent over the swath width. Swath width is the length between the points at which the delivery drops below 90 percent of the design.
3. Document the adequacy of dispersant application systems not fully covered by ASTM F1413-07 by presenting independent evaluation materials (e.g., laboratory and field tests or reports of actual use). If an OSRO plans to use such a system, then the evaluation materials should be submitted to the NSFCC for evaluation.
4. Evaluation of equipment for compliance with ASTM standards is conducted during the NSFCC's PAVs. OSROs must maintain manufacturer data on all dispersant spray equipment. If the manufacturer cannot supply the performance data, then the OSRO can perform independent testing of dispersant applicators, this testing should be done in accordance with ASTM F1738-10 when applicable. Documentation for performance data or equivalents should include:
  - a. Performance data:
    - (1) Droplet size: VMD.
    - (2) Volumetric output distribution over the swath width.
    - (3) A table of pump rates and dispersant injection rates or equivalent indices.
    - (4) Nozzle design height for ship/boat systems.
    - (5) Swath width.
    - (6) Differential speeds for aircraft systems at various pump settings (or equivalents) and aircraft speeds.
    - (7) Recommended operating pressures at the inlet to the boom.
  - b. Dosage chart: A chart of dosages achievable with different application vehicle speeds and different dispersant flow rates, boom pressures, or other appropriate injection indicators.
5. Ensure routine maintenance is performed on all dispersant equipment. Conduct calibration of oil spill dispersant application equipment in accordance with ASTM F1460-07 and testing of oil spill dispersant application equipment in accordance with ASTM F1738-07.

**K. Aerial Oil Tracking and Application Capabilities for Dispersant Use.**

1. Per the VRP and FRP regulations, 33 CFR 155.1035 and 33 CFR 154.1035, plans must provide oil-tracking capabilities and thus must identify a resource provider and the type and location of aerial surveillance aircraft that are ensured available through contract or other approved means. The aerial tracking resources must be capable of arriving at the site of a discharge in advance of the arrival of response resources identified in plans for WCD tiers 1, 2, and 3 response times, and for a distance up to 50 NM from shore. To meet the requirement listed in 33 CFR 155.1050(j) and 33 CFR 155.1050(l), aircraft and personnel must be appropriately located to meet the response time requirement, sufficient numbers of aircraft pilots, and trained observation personnel to support oil spill operations. This should commence upon initial assessment and aircraft and personnel must be capable of coordinating



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on-scene cleanup operations for dispersant operations. Observation personnel must be trained in the protocols of oil spill reporting and assessment and familiar with the use of pertinent guides, including, but not limited to, National Oceanic and Atmospheric Administration's (NOAA) "Open Water Oil Identification Job Aid for Aerial Observation" and the "Characteristic Coastal Habitats" guide (33 CFR 155.1050(1)(2)(iii) and 33 CFR 154.1045(j)(4)(2)).

2. As a planning standard for classification, oil-tracking aircraft must be able to arrive at the site of the discharge 50 NM offshore within seven hours for Tier 1, 24 hours for Tier 2, and 48 hours for Tier 3.
3. Mobilization times are added to the calculated transit time from the home base to the primary staging site to determine the time of arrival on-scene. For oil tracking aircraft, mobilization times are listed in the table in paragraph (M)(3).
4. OSROs shall provide the NSFCC with a list of their aerial oil tracking and application capabilities to include: type of aircraft; aircraft transit speed; aircraft housing locations (address and latitude/longitude); mobilization times; and distances from the aircraft housing locations to the OSRO selected staging sites for each COTP zone.

L. Personnel.

1. The number of personnel needed to support a response depends on numerous factors. OSROs seeking dispersant classification shall ensure that they have sufficient numbers of pilots, staging airport support and management personnel, and trained observation personnel to support aerial requirements.
2. OSROs must meet the personnel requirements for dispersant operations in 33 CFR 154.1045(i)(2)(iv) and 33 CFR 155.1050(k)(2)(iv). An OSRO must provide confirmation that personnel have received the proper training and are capable of applying dispersants according to the recommended procedures contained in ASTM 1737-07. PAVs review personnel training records and rosters to ensure compliance.

M. Response Times and Dispersant Stockpiles.

1. In addition to dispersant resource quantities, OSROs are required to meet certain response times (33 CFR 154.1045 and 33 CFR 155.1050). The response times for classification were derived from the regulations, standardized for classification (33 CFR 155.1050 (l)), and are summarized below. Dispersant application operations must commence within seven hours of the FOSC's approval to use dispersants. The dispersant provider has 12 hours to complete dispersant application for Tier 1, 36 hours to complete dispersant application for Tier 2, and 60 hours to complete dispersant application for Tier 3. The amount that must be applied within the time frames is listed in 33 CFR 154.1045(i) and 33 CFR 155.1050(k).
2. Dispersant stockpiles are calculated within the RRI, and arrival times are based on the distance from the stockpile location to the OSRO selected primary staging site using the applicable transit speeds and routes. For Tier 1, all required dispersants must arrive within seven hours of the FOSC's decision to use dispersants. However, the requirement can be waived if an OSRO has demonstrated its ability to fully apply 8,250 gallons (Gulf Coast) or

4,125 gallons (all other U.S.) by the twelfth hour. In this case, it is acceptable as long as the stockpile arrives at the staging site prior to the arrival of the first dispersant platform. For Tier 2, 50% of the required dispersants (11,687 gallons) must arrive within 24 hours of the FOSC’s decision to use dispersants and the remaining dispersants (11,688 gallons) must arrive within 30 hours. For Tier 3, all required dispersants must arrive within 48 hours of the FOSC’s decision to use dispersants.

3. Mobilization times for moving dispersant stockpiles are the same as for mechanical recovery transport and are listed in the table below.

Table 5-2: Resource Notification/Mobilization Response Times in Hours

Resource Status	Response Personnel Availability	
	On-Site	Recall
Owned/Dedicated	1	2
Contract or Dedicated	1.5	2.5
Owned/Non-dedicated	2.5	3.5
Contract /Non-dedicated	3	4

Note: Full-time personnel are a dedicated resource. Part-time personnel are a non-dedicated resource. On-site indicates a 24 hour staffed resource site, as opposed to personnel who have to be recalled.

N. Providing DMP2 Screenshots to the NSFCC.

1. The NSFCC requires that an OSRO provide a screenshot of their DMP2 calculations, as documentation, for each dispersant application resource for Tiers 1, 2, and 3, for each staging area within the COTP zone or ACC for which they are applying for a classification.
2. There is only one dispersant classification level for each COTP zone based on response times and resources arriving at a point 50 NM offshore from the OSRO selected primary dispersant staging site or home base. OSROs need to provide one set (one for each tier applied for) of DMP2 screenshots for each COTP zone. If using multiple staging sites, a screenshot is required for each staging site for that COTP zone.
3. Screenshots should display the mobilization time in section 3. The “print page” function in the DMP2 calculator does not display the mobilization time. As a result, screenshots should be done by other means, such as the print screen function (press Control and PrtScn) and then paste into a word file. If other means are not available then a hand written mobilization time on the screenshot will suffice.
4. Screenshots can be sent via email to the NSFCC at [D05-SMB-NSFCC-RRI@uscg.mil](mailto:D05-SMB-NSFCC-RRI@uscg.mil).

O. Calculating EDAC for Aircraft.

1. OSROs should follow the instructions listed below for using the NOAA DMP2 Calculator:

a. Dosage Page:

(1) Section 1:

(a) The Dispersant-to-Oil Ratio (DOR) is 1:20.

(2) Section 2:

(a) Use Option 1. The desired dosage value is 5 gallons/acre (46.8 liters/hectare).

(3) Section 3:

(a) Select Option 1 for the desired dosage.

(4) Section 4:

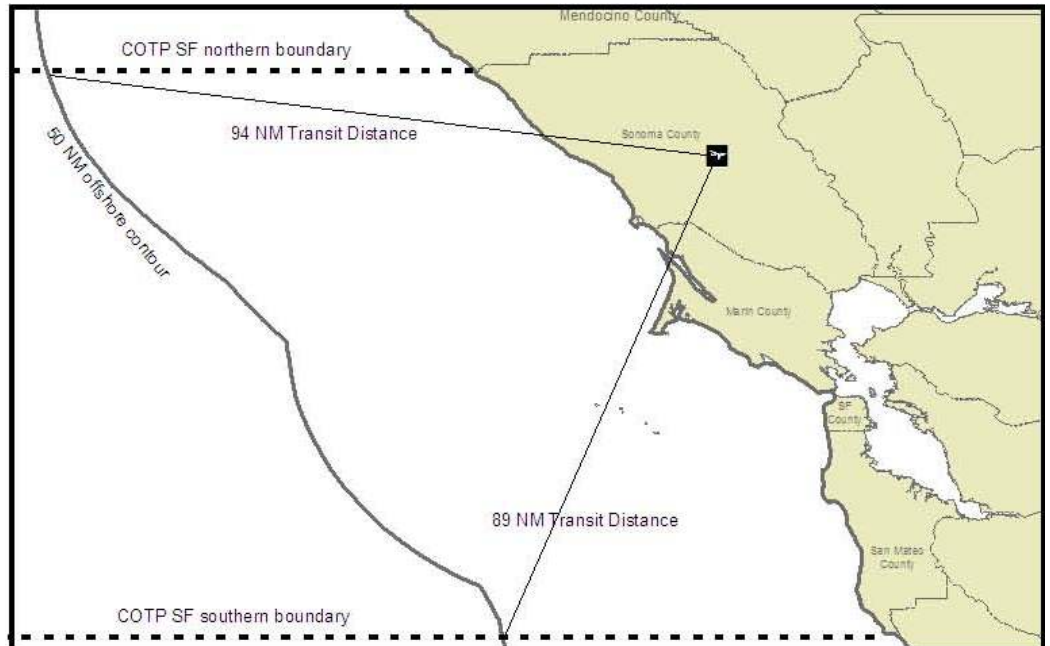
(a) Choose aircraft and select “Go to Calculation.”

b. Aircraft Calculation Page:

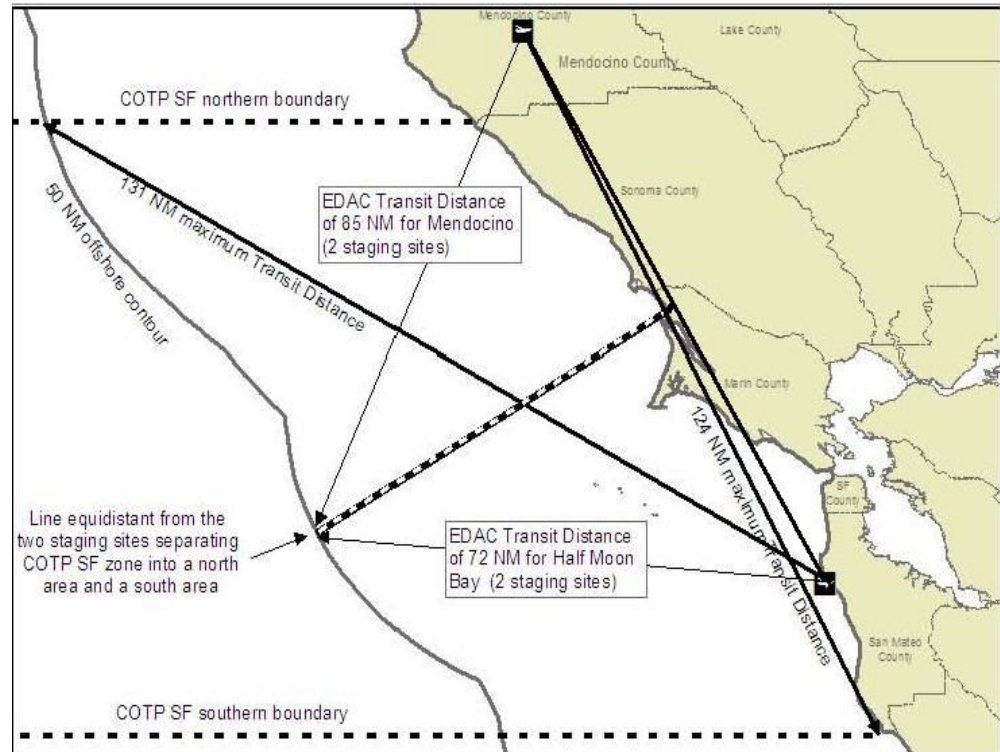
(1) Section 1:

- (a) The utilization time is 12 hours.
- (b) The average pass length is 4 NM.
- (c) One-way transit distance is a distance that the OSRO must calculate by measuring the furthest distance from the staging site within an area defined by the COTP boundaries and a 50 NM coastal contour line. This means that the furthest spill site could be on a COTP boundary line or it could be on the 50 NM contour line. The furthest point within that area is the one that determines the one-way transit distance. All sites must meet the operational requirements for each aircraft that will be used for dispersing or delivering dispersant stockpiles. Staging sites do not need to be within the COTP zone to be selected as a staging site. Staging site addresses, latitudes and longitudes, and the airport identification code must be submitted to the NSFCC.
  - (i) To calculate the distance using one staging site, draw a 50 NM contour line that parallels the coast. The furthest distance on the contour line or COTP boundary within the COTP zone from the OSRO selected primary staging airport is the distance that should be entered into the one-way transit distance.
  - (ii) The following diagram illustrates the determination of the EDAC transit distance for COTP San Francisco using the Sonoma County Airport as the OSRO selected primary dispersant staging point. The distance from the

staging point to the furthest extent of the 50 NM off shore contour is measured as 94 NM.



- (iii) Multiple staging sites for one COTP zone can be specified in a plan. To calculate the furthest distance using multiple staging sites, a 50 NM contour line that parallels the coast should be drawn. Draw a straight line between the staging sites. At the equidistant point between the staging sites, draw a straight line out to the 50 NM contour line. The line out to the contour line divides the COTP zone into smaller, separate response areas and the furthest distance to the spill site is calculated within that smaller response area.
- (iv) The next diagram provides an example for two possible staging sites, the Mendocino County Airport and the Half Moon Bay Airport. If the Mendocino County Airport was the only staging site specified in the plan, the EDAC Transit Distance would be 124 NM. The EDAC transit distance for Half Moon Bay would be 131 NM if it were the only staging site specified in the plan. However, if both airports were specified as staging sites in the plan, the COTP zone could be divided into two areas by a line equidistant from the two airports. The diagram shows the San Francisco COTP zone with a dispersant staging site at the Mendocino County Airport for the northern area of the COTP zone. There is an EDAC transit distance of 85 NM and a dispersant staging site at the Half Moon Bay Airport for the southern area of the COTP zone, including an EDAC transit distance of 72 NM.



(2) Section 2:

- (a) To specify a platform OSROs can either select one of the aircraft in the DMP2 database, which can be edited, or they can add a new aircraft. When adding a new aircraft, OSROs will be required to fill in all of the blocks on the left hand side of the aircraft entry page. In addition, when cascading in, OSROs will be required to fill in the cascade parameters on the right hand side of the aircraft entry page. Parameters entered must be based on aircraft capability. Per 33 CFR 154.1045(g)(2) (ii) and 33 CFR 155.1050(k)(2)(ii), dispersant-application platforms not detailed within the DMP2 or existing platforms that have been modified within the DMP2, adequacy of performance criteria must be documented by presentation of materials to the NSFCC.



- (x) Fuel Load Time: The time necessary to load fuel onto the spraying platform. In EDAC mode it is assumed that dispersants and fuel are loaded simultaneously with the exception of the C-130 H MASS.
  - (xi) Maximum Operating Time: The maximum time a platform can operate with a full payload while retaining a regulatory fuel reserve for aircraft platforms.
  - (xii) Payload: The maximum volume in gallons of dispersant a platform can carry to the furthest 50 NM point offshore in the COTP zone from the OSRO selected primary staging airport.
  - (xiii) Taxi, Land, Depart: The elapsed time for aircraft platforms from initial movement on the ground to wheels-up at the beginning of a sortie, plus the time from touch-down to when the aircraft comes to a complete stop at the staging airfield at the end of a sortie.
- (3) Section 3:
- (a) All OSROs must enter a mobilization time and cascade distance when aircraft are not using their home base as the staging site. Cascading of aircraft from out-of-area requires entries for the platform/dispersant mobilization time, cascade distance, and platform dispersant payload status (loaded or empty). Cascading aircraft have a 45-minute briefing at the primary dispersant staging site prior to commencing spraying operations. Cascading reduces the utilization time resulting in the use of adjusted utilization time for aircraft calculations.
  - (b) The cascading distance is the distance from the aircraft's home base to the OSRO selected dispersant staging site.
  - (c) OSROs shall use the time specified in their contract with the aircraft or other acceptable documentation to determine mobilization time.
  - (d) If an OSRO receives a negative number in the adjusted utilization time in section 3, then the asset does not meet Tier 1 requirements and changes in assets or locations may be necessary. If calculating Tier 2 or Tier 3, then further calculations are required to determine if an adjusted utilization time for those tiers is necessary. To calculate for Tier 2 or Tier 3 with a negative adjusted utilization time, take the following steps:
    - (i) Adjusted Utilization Time (use it as a positive number) + Utilization Time + One-Way Transit Time = Time of arrival on scene.
    - (ii) If the time of arrival falls into the Tier 2 timeframe (12-36), calculate 36 minus the time of arrival on scene. If it falls into the Tier 3 timeframe (36-60), calculate 60 minus the time of arrival on scene. Enter the resulting number into the Utilization Time block in section 1. Clear out the mobilization and cascade distance in section 3 and calculate. If the number is greater than 12 then full EDAC will be counted for that tier. Nothing greater than 12 should be entered into the utilization time because 12 hours is the maximum dispersant operating time. If the number is less than 12, then the calculation will produce a reduced EDAC for Tier 2 or Tier 3.



- (iii) Two screenshots are required when a negative adjusted utilization time results for Tier 2 and Tier 3. These screenshots include a screenshot showing the negative adjusted utilization time and a screenshot with the new utilization time and calculated EDAC.

(4) Section 4:

- (a) Aircraft platforms will be allowed to apply dispersants in both directions (bidirectional application) and load fuel and dispersants simultaneously.
- (b) The Calculate button displays the EDAC under the dispersants applied section.
- (c) The Set EDAC button restores the EDAC scenario to:
  - (i) DOR – 1:20.
  - (ii) Dosage – 5 gallons per acre.
  - (iii) Average Pass Length – 4 NM.
  - (iv) Utilization Time – 12 hours.
  - (v) Simultaneous or Separate Loading of fuel and dispersant – Simultaneous.
  - (i) Bidirectional or Unidirectional – Bidirectional.
- (d) The Pie Chart button graphically displays how the time is being used. Segments are divided into repositioning, resupply, spray, transit, and other.
- (e) The Maximum Transit Distance is useful to estimate how far from the staging airport that an aircraft platform can travel to a spill site, deliver a payload of dispersant, and return to the staging airport within its maximum operating time.
- (f) Check-in time of 10 minutes with spotter aircraft occurs at the beginning of each sortie. Spotter aircraft are assumed on-scene waiting for dispersant spray aircraft.
- (g) An OSRO may be able to maximize EDAC by adjusting the maximum operating time and payloads in accordance with aircraft specifications. This can adjust the time of the sortie and may help if an error message pops-up and states that, “the time per sortie exceeds the max op time.”

P. Calculating EDAC for Vessels.

1. Vessels listed in the DMP2 are generalized and should not be used. OSROs will need to add their specific vessel information into the vessel calculation page and provide vessel performance supporting documentation.
2. The DMP2 only calculates EDAC for vessels traveling to the spill site and returning to home base or staging base to load dispersant and fuel and return to the spill site. Other vessel operating options will be handled on a case by case basis. If using other methods, OSROs should provide information and data to support other means of operation for EDAC calculations.

3. OSROs should follow the instructions listed below for using the NOAA DMP2 Calculator:
- a. Dosage Page:

**Exit DMP**      **Dosage Page**      **Conversions**      **Documentation**  
**Slick/Dosage Parameters**      **Useful Links**  
**Slick/Dosage Discussion**      **Print Page**

① Select a Dispersant-to-Oil Ratio (DOR) 1:   
(1:20 is the default)

② **Option 1 - Input Dosage directly**  
- Specify a Desired Dosage Value  Gallons/Acre      46.8 Liters/Hectare  
*This corresponds to a treatment of ...*  
- A nominal oil slick Thickness of: 0.0037 Inches      0.094 Millimeters  
- An oil slick concentration of: 100.0 Gallons/Acre      2.38 Barrels/Acre  
93.5 Cubic Meters/Sq Km      0.94 Cubic Meters/Hectare  
- A slick Description of: Transitional Dark (or True) Color      **Clear Option 1**

② **Option 2 - Estimate Dosage from slick description**  
Est. Volume of oil spilled:        Estimate the % coverage:   
Est. Area of the oil slick:    
*Calculated Thickness & Dosage at a DOR of 1: 20*  
Inches      Millimeters  
Gallons/Acre      Liters/Hectare      **Clear Option 2**

③ Select Desired Dosage from Option 1 or Option 2 above       Option 1     Option 2

④ Select Platform Type     Aircraft     Vessel      ⑤ **Go To Calculation**

- (1) Section 1:  
(a) The DOR is 1:20.
- (2) Section 2:  
(a) Use Option 1. The desired dosage value is 5 gallons/acre (46.8 liters/hectare).
- (3) Section 3:  
(a) Select Option 1 for the desired dosage.
- (4) Section 4:  
(a) Choose vessel and select “Go to Calculation.”

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b. Vessel Calculation Page:

(1) Section 1:

- (a) The utilization time is 12 hours.
- (b) The average pass length is 4 NM.
- (c) One-way transit distance is a distance that the OSRO’s vessel must transit from its homeport or selected staging site to the furthest spill site 50 NM offshore within a COTP zone via viable water routes, straight line distance is not permitted. Staging sites do not need to be within the COTP zone to be selected as staging sites. All staging sites must meet the operational needs for each vessel. Staging site addresses and latitudes and longitudes must be submitted to the NSFCC.
  - (i) To calculate the transit distance using one staging site, draw a 50 NM contour line that parallels the coast. The furthest distance on the contour line or COTP boundary within the COTP zone should be located and the viable water route to that site from the vessel’s home port or staging base is the distance that should be entered into the one-way transit distance. See the example in paragraph N.1.b.(1)(c)(ii).
  - (ii) Multiple staging sites can be specified in a plan and calculated as described in paragraph N.1.b.(1)(c)(iii).

(2) Section 2:

- (a) To specify a vessel platform, OSROs will need to create a new vessel. To add a new vessel, OSRO’s fill in all of the blocks on the left hand side of the vessel entry page. In addition, when cascading in, OSROs will also be required to fill in the cascade parameters on the right hand side of the vessel entry page. Parameters entered must be based on vessel capability. Per 33 CFR

154.1045(g)(2)(ii) and 33 CFR 155.1050(k)(2)(ii), for dispersant application platforms not detailed within the DMP2, adequacy of performance criteria must be documented by presentation of materials to the NSFCC (e.g. the vessel's transit speed).

Platform			X	Return
				Print Platform
				Clear & Exit
	<b>Max</b>	<b>Min</b>		
Dispersant Pump Rate			Gallons per Minute	
Swath Width			Feet	
Application Speed			Knots	
Transit Speed			Knots	
U Turn Time		Minutes		
Dispersant Load Time		Minutes		
Fuel Load Time		Minutes		
Max Operating Time		Hours		
Payload		Gallons		
Always Refuel?		Yes or No		
<b>All the above fields require an entry</b>				
				<b>Cascade Parameters</b>
				Max Range With Payload <input style="width: 40px;" type="text"/> Nautical Miles
				Cascade Transit Speed <input style="width: 40px;" type="text"/> Knots
				Staging Area Briefing <input style="width: 40px;" type="text"/> Minutes
				Entries for the Cascade Parameters above are necessary if performing the optional Cascading computation

- (i) **Pump Rate:** The rate in gallon per minute at which dispersant is pumped through the dispersant spraying system. The DMP2 computes the pump rate necessary to achieve the desired dosage, based on the application speed and the swath width.
- (ii) **Swath Width:** The length measured perpendicular to the dispersant application track between the points at which delivery on the oil slick drops below 90 percent of the designated dosage (ASTM Standard F 1413-92).
- (iii) **Application Speed:** The ground speed at which the platform applies dispersant.
- (iv) **Transit Speed:** The ground speed of the dispersant platform between the staging site and the area of the oil slick.
- (v) **U Turn Time:** The time necessary for the dispersant platform to make a 180-degree turn between spraying passes.
- (vi) **Dispersant Load Time:** The time necessary to load dispersant into the tank on the dispersant platform. In EDAC mode it is assumed that dispersants and fuel are loaded simultaneously.
- (vii) **Fuel Load Time:** The time necessary to load fuel onto the spraying platform. In EDAC mode it is assumed that dispersants and fuel are loaded simultaneously.

- (viii) Maximum Operating Time: The maximum time a platform can operate with a full payload while retaining a regulatory fuel reserve for aircraft platforms.
- (ix) Payload: The maximum volume in gallons of dispersant a platform can carry.

(3) Section 3

- (a) All OSROs must enter a mobilization time and cascade distance when vessels are not using their homeport as the staging site. Cascade distances are also required to be calculated using viable water routes for the vessel. Cascading of vessels from out-of-area requires entries for the platform/dispersant mobilization time, cascade distance, and platform range with dispersant payload. Cascading vessels have a 45-minute briefing at the primary dispersant staging site prior to commencing spraying operations. Cascading reduces the utilization time, which results in the use of adjusted utilization time for DMP2 calculations.
- (b) The cascading distance is the distance from the vessel's homeport to the primary dispersant staging site via viable water routes.
- (c) Mobilization times for vessels are the same as the planning factors used for mechanical classification as listed in paragraph (M)(3).

(4) Section 4

- (a) Vessel operations are considered for two modes – Continuous or Discontinuous Spraying.
- (b) Continuous Spraying mode: A vessel transits to the spill site from the staging point, checks in with on-scene control, rigs for dispersing, and sprays continuously until dispersant is depleted or utilization time has expired. This mode is not to be used for vessel EDAC calculations.
- (c) Discontinuous Spraying mode: A vessel sprays with a specified average pass length, performs a u-turn while not spraying, sprays again for another pass, and repeats until dispersant is depleted or until utilization time has expired. For classification purposes, discontinuous spraying mode is the only accepted mode.
- (d) The Calculate button displays the EDAC under the dispersants applied section.
- (e) The Pie Chart button graphically displays how the time is being used. Segments are divided into repositioning, resupply, spray, transit, and other.
- (f) The Maximum Transit Distance is useful to estimate how far from the staging site a vessel can travel to a spill site, deliver a payload of dispersant, and return to the staging site within its maximum operating time.
- (g) Dispersant operation commencement will be based on the one-way transit time in section 1.
- (h) NSFCC evaluates the EDAC based on how much time a vessel has on-scene to disperse within each tier. For example, for Tier 1, a vessel that has a one-way transit time of 7.5 hours will have 4.5 hours remaining to disperse. However, the

DMP2 calculator does not calculate EDAC in terms of tier requirements. Therefore, the NSFCC takes the calculated dispersants applied in section 4 and divide it by the spray time per sortie in section 2. This will give the approximate amount of dispersant applied per minute, which then can be multiplied by the number of minutes (4.5 hours = 270 minutes) remaining on-scene for that tier. The result is a derated EDAC for that vessel.

## CHAPTER 6. Verification Process

### A. Introduction and Purpose.

1. The verification process encompasses the initial site assessment plus subsequent follow on assessments. During resource verification, the Coast Guard ensures that OSRO resources are consistent with classifications, examines equipment systems, and reviews maintenance and training programs.
2. The Coast Guard may assess each site that an OSRO has included in their application to verify resources. Both owned and contracted sites are verified by the Coast Guard. Verify the resources identified in the RRI as follows:
  - a. Complete a visual equipment survey of the condition of resources.
  - b. Ensure the response resources are properly maintained and ensure that maintenance is documented.
  - c. Ensure the OSRO has sufficient personnel available and trained to mobilize, deploy, and operate the equipment identified in the application.
  - d. Ensure OSRO personnel meet the Hazardous Waste Operations and Emergency Response (HAZWOPER) requirement in 29 CFR 1910.120 and documentation is available for inspection.
  - e. Verify the inventory for the system's operability and logistics support capability.
  - f. Review records of participation in exercises.
  - g. Where applicable, review the site's logistics narrative and determine the status of the support services listed in the narrative (e.g., equipment rentals, commercial drivers, and personnel services, etc.) plus their ability to mobilize and sustain the resources.
3. An OSRO is subject to periodic examination to maintain its classification status. In addition to periodic examinations to maintain classification status, verifications may also occur. The basis for verifications might include:
  - a. Unsatisfactory verification visit.
  - b. COTP request.
  - c. OSRO's poor performance during spill or exercises.
  - d. OSRO request.
  - e. Change in ownership.

### B. Frequency.

1. At a minimum, PAVs are conducted on owned and contracted OSRO sites within approximately 100 miles of the COTP office every three years. To the maximum extent possible, the NSFCC will conduct PAVs in conjunction with government-led, full scale National Preparedness for Response Exercise Program (PREP) exercises. If a PAV is conducted in relation to a PREP exercise, that PAV will count as the COTP's triennial PAV.

C. Verification of Personnel Training.

1. Through documentation, discussions, and informal interviews, the Coast Guard verifies that all response personnel at the resource site are trained in accordance with HAZWOPER regulations, 29 CFR 1910.120, and the OSRO's internal training program.
2. Prior to the Coast Guard's visit, the OSRO should review personnel records and subcontracting or consulting agreements to verify the number and availability of trained personnel listed within the RRI.

D. Examination of Equipment Systems and Maintenance Records.

1. To determine whether the OSRO's dispersant product quantity are consistent with the classification level, the Coast Guard conducts a crosscheck of the OSRO's resource amounts to those required by the appropriate classification level. When completing the visual equipment survey, the Coast Guard will examine equipment systems from each response resource category. All systems that count toward classification should be in working order and able to be deployed into the marine environment. The OSRO may be required to operate one or more systems for the verification team.
2. In addition to a physical examination of equipment systems, conduct a review of all applicable equipment maintenance records. Records should be maintained on-site at manned locations and include the equipment maintenance history and proof of ownership, lease, or subcontract. At unmanned sites with staged equipment, have equipment maintenance records readily available.

E. Review of Maintenance Program and Performance Capabilities.

1. The inspectors review the OSRO's maintenance program to ensure that the equipment is properly maintained as required by 33 CFR 154.1057 and 33 CFR 155.1062. The verification team may consider, among other conditions, the following criteria:
  - a. Boom.
    - (1) Overall condition.
    - (2) Evidence of ownership, lease, or subcontract.
    - (3) Manufacturer, type, and quantity.
    - (4) Compatibility of connectors.
    - (5) Number and adequacy of anchors.
    - (6) Transportability.
    - (7) Planned operating area(s).
  - b. Recovery Devices (Skimmers and Vacuum Trucks).
    - (1) Evidence of ownership, lease, or subcontract.
    - (2) Manufacturer, type, model, and throughput capacity.



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- (3) Compatibility of components (hoses, suction and skimmer head, couplings, connectors, etc.).
  - (4) Operability and maintenance.
  - (5) Condition of the prime mover and other supporting equipment.
  - (6) Holding capacity.
  - (7) Planned operating area(s).
- c. Oil Spill Response Vessels (Skimmers, Barges, and Support Craft).
- (1) Evidence of ownership, lease, or subcontract.
  - (2) Operability and maintenance.
  - (3) Storage capacity.
  - (4) Inspection/certification.
  - (5) Planned operating areas.
  - (6) Grade of oil carried.
  - (7) Offload capability.
  - (8) Length, beam, draft, range, transit speed, and crew size.
- d. Temporary Storage Devices.
- (1) Evidence of ownership, lease, or subcontract.
  - (2) Manufacturer, type, and model (as applicable).
  - (3) Capacity (twice the daily capacity of recovery devices).
  - (4) Inspected and maintained in accordance with manufacturer's recommendations.
  - (5) Contracted barges with current certificates.
  - (6) Planned operating area(s).
  - (7) Grade of oil carried.
  - (8) Location of fixed storage.
- e. Boats.
- (1) Sufficient numbers of trailers, outboard motors, and Coast Guard-required safety equipment (life jackets, lights, etc.).
  - (2) Types and number of boats appropriate to the area of classification.
  - (3) Operability and maintenance.
  - (4) Length, beam, draft, range, transit speed, and crew size.
  - (5) Adequate working platform for oil spill response.
  - (6) Certification/registration.

- f. Dispersants.
  - (1) Manufacturer, type, and quantity.
  - (2) Volumes of dispersant(s) to support WCD tiers.
  - (3) Stowage.
  - (4) Identification of dispersant product resource provider.
  - (5) Primary staging site location.
  - (6) Distance between product's home base and primary staging site.
  - (7) Amount of each stockpile required to support required EDAC of each dispersant application platform.
  - (8) EDAC determination using DMP2.
- g. Application Platforms.
  - (1) Type.
  - (2) Providing resource organization.
  - (3) Distance between platform's home base and identified primary dispersant staging site.
  - (4) Dispersant payload for each dispersant application platform.
- h. Aerial Oil Tracking and Application Capabilities.
  - (1) Identification of resource provider.
  - (2) Type and location of aerial surveillance aircraft available, through contract or other approved means.
  - (3) At least 50 percent of each EDAC tier requirement must be achieved through the use of fixed-wing, aircraft-based application platforms.
  - (4) Capability of arriving at the site of a discharge in advance of the arrival of response resources identified in the plan for WCD tiers 1, 2, and 3 response times, and for a distance up to 50 nautical miles from shore (excluding inland areas).
  - (5) Capability of supporting oil spill removal operations continuously for three 10-hour operational periods during the initial 72 hours of the discharge.
  - (6) Numbers of aircraft, pilots, and trained observation personnel.
- i. Groups II-IV (within inland, near shore, or offshore where preauthorization exists).
  - (1) Capability of commencing dispersant application operations at site of discharge within seven hours of decision by FOSC.
  - (2) Capability to meet Tier 1, 2, and 3 response times for completed applications Table 33 CFR 155.1050(l).
- j. Logistics Narrative. An OSRO could be asked to provide a written narrative outlining the logistics requirements for each resource site listed in the RRI. Narratives need to

provide enough information to document that an OSRO has the myriad and complex logistics support requirements for the mobilization and delivery of the response equipment and personnel from each resource site to each COTP city or ACC requested. Narratives might contain, but are not limited to:

- (1) Methods of personnel recall (if applicable).
- (2) Methods of loading resources for mobilization.
- (3) Methods of resource transport off-site to incident or staging.
- (4) Methods of mobilizing, deploying, and supporting resources.
- (5) Special response resources staging (e.g., prepackaging, palletizing, preloading).
- (6) Necessary site support services (e.g., tractors, trailers, drivers, cranes, etc.).

F. Verification Results.

1. When the verification visit is complete, the PAV team conducts an out brief with the OSRO to discuss any discrepancies found during the visit. If discrepancies are found, the OSRO has 30 days to correct all discrepancies and provide the NSFCC with appropriate documentation confirming completion of all discrepancy corrections.
2. If the OSRO fails to rectify their discrepancies within the proscribed time period, the NSFCC, with COTP consultation, may suspend or downgrade the OSRO's classification due to their failure to meet OSRO classification requirements. Reasons for downgrading or suspending a classification can include:
  - a. Resources listed by the OSRO in the RRI could not be verified and/or do not match the classification level requirements.
  - b. Response resources are unable to meet response times or do not function properly during drills, exercises, responses, and/or inspections.
  - c. OSRO fails to meet the training, maintenance, and exercise provisions of these guidelines.
3. If an OSRO disagrees with the results of a verification visit, it may appeal in writing to the Commanding Officer of the NSFCC within 30 days of the visit. If the OSRO remains unsatisfied with the determination after the appeal, a second appeal may be made to the program manager at CG-MER.

## CHAPTER 7. Applying the Revised OSRO Guidelines in the Field

### A. Overview.

1. This chapter is intended to provide guidance to the field on how to apply the revised OSRO Guidelines at the port level including changes to the OSRO classification program, which cover both mechanical and dispersant providing OSROs. This document emphasizes the vital role the COTP plays in oversight and examination of OSRO capabilities, response planning, and response execution. Guidance is provided to assist with the below field responsibilities:
  - a. Conducting plan review.
  - b. Using government-initiated unannounced exercises to evaluate average most probable discharge (AMPD) OSRO response capabilities.
  - c. Employing existing field activities to validate overall capability of both mechanical and dispersant providing OSROs.

### B. Validating Response Capability at the Port Level.

1. Per OPA 90, port-level response capability is described in VRPs and FRPs developed by industry, and in ACPs written by the federal, state, and local governments. VRPs, FRPs, and ACPs rely on OSROs for plan execution. In any given port, a small number of OSROs support all industry and government plan holders operating in that port.
2. The COTP plays two unique roles, the first as a regulatory oversight agency monitoring industry plan holders and the response capabilities of their OSROs. The second role is as a government plan holder relying directly on OSROs to meet specific response needs in the event of a federally assumed spill. Validating response capabilities is vital to fulfilling the obligations of both roles. This guidance will assist COTPs in their role of overseeing industry response plan holders.

### C. The Revised OSRO Guidelines.

1. The OSRO Classification Program was established to assist industry plan holders in identifying and contracting qualified response equipment providers. The program also is intended for use by government plan reviewers as a national standard by which to examine equipment documentation submitted by industry plan holders.
2. OSRO classification is not intended to represent a certification, but to reflect an approximation of capability. This capability requires validation from industry plan holders and the government to ensure that OSRO capabilities are able to meet specific response needs. OSRO Guidelines and the OSRO Classification Program represent a starting point for evaluation of an OSRO.
3. The most significant revision to the guidelines is the addition of dispersant providing OSRO classifications. Plan holders should review these regulations to understand what additional responsibilities belong to plan holders when listing a classified Dispersant Providing OSRO in their FRP or VRP. It should also be noted that a Mechanical OSRO classification is in no way interrelated to a Dispersant Providing OSRO classification. The two classifications are

independent of each other. The revised guidelines can be found at:  
<http://www.uscg.mil/hq/nsfweb/nsf/nsfcc/ops/ResponseSupport/RRAB/becomeaclassifiedosro.asp>.

D. Validation by COTPs.

1. The OSRO classification process hinges on COTP involvement. Through facility response plan review, the field unit ensures plan holders have accounted for adequate OSRO coverage. The COTP has two primary tools for monitoring OSRO capability:
  - a. The revised Guidelines for the U.S. Coast Guard OSRO Classification Program, March 2013.
  - b. The PREP Guidelines or exercise records for those plan holders not enrolled in PREP.
2. The OSRO Guidelines explain the criteria for the NSFCC's classification of an oil spill removal organization. This process benefits both government and industry plan holders because it provides a national standard of review by which a plan holder can evaluate an individual OSRO's capability to respond to, disperse, or recover spills of various sizes. Government and industry plan holders are responsible for screening OSROs to ensure they meet the planning standards for specific operating locations. That responsibility includes validating that response equipment and personnel exist and can be delivered to specific plan holder operating sites within the prescribed timeframes. For example, when an OSRO is given a WCD1 dispersant classification for a COTP zone it means that the OSRO has the potential to provide effective response to a WCD1 spill anywhere within the zone.
3. The NSFCC assigns a classification by measuring the distance between the OSRO's equipment site and the appropriate Coast Guard unit or ACC. In some cases, an OSRO may readily be able to meet the regulatory response times for a vessel or facility spill near the unit, but not for a spill during a transfer operation located at the edge of the COTP zone.

E. Preparedness Assessment Verification (PAV) Program.

1. Participation from the COTP is strongly encouraged during PAVs. Sector staff can also invite other local, state, and federal agencies to participate in the PAV. The goal of aligning PAVs with PREP exercises is to provide the COTP with information that should complement the lessons learned during a PREP area exercise and provide an enhanced "big picture" view of area response readiness. Lessons learned may heavily influence and encourage annual ACP review and updates. A final report of findings will be provided by the NSFCC to the COTP and the applicable Coast Guard Districts, Environmental Protection Agency (EPA) regions, and area committees.

F. PAV After Action Reports.

1. COTPs should be familiar with plan holder operations in their zone in order to effectively evaluate response capabilities and identify potential situations similar to the example provided in (D)(3). It is important for field personnel to know the location of transfer sites in relation to a plan holder's response resources. During regular interaction with industry (e.g., transfer monitors, plan reviews, and unannounced exercises), the Coast Guard should ask

plan holders how they would mount a spill response to a particular transfer site. The COTPs can reference After Action Reports (AAR) from PAVs conducted within their respective AORs to evaluate a plan holder's response capability. AARs are documents that detail the response capabilities of classified and non-classified OSROs within an AOR.

2. If based on the review, a plan holder's OSRO cannot meet the planning standards for its specific operating sites the COTP should take appropriate enforcement action (e.g. a letter of warning, civil penalty, or suspension of operations) to ensure compliance by the plan holder. Consistent COTP oversight is necessary to ensure the viability of this program.

G. Alternate Classification Cities (ACC) Program.

1. Traditionally, OSRO capability has been measured from COTP cities identified in 33 CFR 3.05-10 through 33 CFR 3.85-15. Recognizing that commercial operation often occurs in ports other than the COTP cities, ACCs have been identified. ACCs are Coast Guard designated locations used in addition to the city that the COTP is located within for classifying OSROs. ACCs help to alleviate the concern that in larger COTP zones a spill could occur at a great distance from the COTP city to which an OSRO could not respond within the regulatory timeframes.
2. The following ACCs are geographic locations within the United States that have been designated to fill coverage gaps between COTP cities:
  - a. Cape Fear River, NC; COTP North Carolina.
  - b. Huntington, WV; COTP Ohio Valley.
  - c. Paducah, KY; COTP Ohio Valley.
  - d. Panama City, FL; COTP Mobile.
  - e. Port Canaveral, FL; COTP Jacksonville.
  - f. Toledo, OH; COTP Detroit.
  - g. Cleveland, OH; COTP Buffalo.
  - h. Oswego, NY; COTP Buffalo.
  - i. Marquette, MI; COTP Sault Ste. Marie.
  - j. Traverse City, MI; COTP Sault Ste. Marie.
  - k. Alpena, MI; COTP; Sault Ste. Marie.
  - l. Chicago, IL; COTP Lake Michigan.
  - m. Eureka, CA; COTP San Francisco.
  - n. Morro Bay, CA; COTP Los Angeles/Long Beach.
  - o. Cape Flattery, WA; COTP Puget Sound.
  - p. Coos Bay, OR; COTP Columbia River.
  - q. Portland, OR; COTP Columbia River.

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- r. American Samoa; COTP Honolulu.
  - s. Adak, AK; COTP Western Alaska.
  - t. Kodiak, AK; COTP Western Alaska.
  - u. Prudhoe Bay, AK; COTP Western Alaska.
  - v. Nome, AK; COTP Western Alaska.
  - w. Unalaska, AK; COTP Western Alaska.
  - x. Ketchikan, AK; COTP Southeast Alaska.
  - y. Sitka, AK; COTP Southeast Alaska.
  - z. Yakutat, AK; COTP Southeast Alaska.
3. Vessel plan holders who intend to operate in these ACCs will be required to ensure adequate OSRO coverage to gain operating approval in these areas.
  4. Send all requests for ACC designations should be sent to the NSFCC. The NSFCC consults with the applicable COTP and CG-MER as they review requests and establish new ACCs.

H. Average Most Probable Discharge (AMPD) Requirements.

1. Although NSFCC no longer classifies OSROs for AMPD capabilities, field capability evaluations remain critical. 33 CFR 154 and 155 have requirements for AMPD readiness in both FRPs and VRPs. This instruction provides an informal checklist, Appendix I and II, for COTP's evaluations of FRPs and VRPs for an AMPD.
2. When a vessel is conducting transfer operations at a facility that is required to submit a response plan under 33 CFR 154.1017, the vessel owner only needs to identify the response resources for an AMPD and is not required to ensure, by contract or other approved means, that resources are available. However this does not mean that the facility is responsible for responding to a spill during a vessel transfer operation. In many cases, the VRP can refer to the same OSROs or equipment that the FRP has (which are ensured by contract or other approved means for a facility response) if the vessel owner/operator ensures resources are available.
3. Either plan holder can be required to exercise their capabilities to ensure the availability of resources, by contract or other means, available to respond to an AMPD. Vessels providing bunkers to other vessels are also required to ensure the availability of AMPD resources by contract or other approved means.

I. COTP Expectations and Steps to Ensuring Facility and Vessel Compliance.

1. COTPs play a key role locally in the VRP and FRP program; including, providing a letter of notification to facility plan holders for review of any updates to the Guidelines and OSRO matrix. Facility plan holders should be directed to evaluate their plans and response resources under the revised OSRO Guidelines criteria and provide confirmation of that review and any plan revisions to the COTP within 90 days of the NSFCC's posting of the revised matrix.

2. COTPs review FRPs and revisions to ensure plan approval is in accordance with the revised OSRO Guidelines. COTPs should ensure AMPD response capabilities are identified within each response plan as no assessment is included under the revised OSRO classification program. Plans are reviewed to ensure that classified and non-classified OSROs listed meet the AMPD regulatory requirements. Advise FRP holders of any plan deficiencies and monitor corrections in accordance with existing deficiency enforcement policies as outlined at the end of this document.
3. COTPs review VRPs to ensure approval by the Coast Guard's Office of Commercial Vessel Compliance (CG-CVC) and that the classification of the OSROs listed is still valid. COTPs should also assess the AMPD capability of tank ships and barges operating in their zone. VRP AMPD information is available online or by fax upon request. COTPs can use this information to evaluate a vessel plan holder's capability to respond to AMPD spills within their zone by measuring the distance between transfer points and the location of AMPD equipment. Field units should concentrate oversight efforts on plan holders that list OSROs with equipment sites located beyond the planning standard distances. Assume these arrangements are inadequate unless the plan holder can certify and demonstrate otherwise.
4. If a plan holder cannot demonstrate compliance, the COTP takes appropriate enforcement action. Basic AMPD OSRO information for vessel plans can be found at: [homeport.uscg.mil/vrpexpress](http://homeport.uscg.mil/vrpexpress). Using Marine Information for Safety & Law Enforcement (MISLE), the tab for "USCG Certificates" also links to VRP Express by clicking on "Check VRP Status." Requests to receive VRP AMPD logistical information by fax may be requested through the VRP Status Line (202-372-1229 or 202-372-1005), a voicemail box that is checked regularly between 0800--1600 EST, Monday through Friday, with the exception of Federal holidays.
5. COTPs should also evaluate the ability for facilities to meet AMPD requirements and ensure wide dissemination of this guidance to all plan holders. Response plan regulations state that AMPD response personnel should be notified and mobilized within a timeframe sufficient to enable them to reach the transfer site within one hour with containment boom, and two hours with oil recovery equipment. It is vital that plan holders notify the OSRO of the need for equipment quickly and that the OSRO demonstrate their capability to mobilize equipment immediately.

J. Some Options for Assessing Compliance.

1. COTPs are authorized to choose from the following activities to assess AMPD capability:
  - a. In the case of facility-owned response equipment, during oil transfer monitors and/or inspections examine the material condition of response equipment located at the facility and ask the facility plan holder about response actions, including status of equipment and deployment personnel (on site or on recall).
  - b. During harbor patrols, visit OSRO equipment sites, examine equipment, and query personnel.



- c. During vessel boardings and oil transfer monitor situations, query vessel or facility transfer personnel about response plan actions.

K. Enforcement.

1. COTPs should take appropriate action against plan holders that have not ensured adequate AMPD coverage. Unsatisfactory completion of a government-initiated unannounced exercise is considered prima facie evidence of non-compliance and enforcement actions should be initiated. In most circumstances, appropriate enforcement action for this deficiency should be suspension of transfer operations until AMPD coverage is demonstrated. Other enforcement options include issuing a COTP letter of warning or civil penalty citation along with a requirement to take corrective action within a specified timeframe, usually 30 days. Failure to comply with corrective actions within the specified timeframe should result in suspension of operations until compliance is achieved. Persistent problems related to VRP AMPD compliance should be reported via the VRP Status Line (202-372-1229 or 202-372-1005) or via email to [vrp@uscg.mil](mailto:vrp@uscg.mil).

APPENDIX A. List of Acronyms

<b>AAR</b>	After Action Report
<b>ACC</b>	Alternate Classification City
<b>ACP</b>	Area Contingency Plan
<b>AMPD</b>	Average Most Probable Discharge
<b>ASTM</b>	American Society for Testing and Materials
<b>bbbl</b>	Barrel; unit of volume
<b>CFR</b>	Code of Federal Regulations
<b>CG-MER</b>	Coast Guard Office of Marine Environmental Response Policy
<b>COTP</b>	Captain of the Port
<b>DMP2</b>	Daily Mission Planner 2
<b>DOR</b>	Dispersant-to-Oil Ratio
<b>EDAC</b>	Effective Daily Application Capacity
<b>EDRC</b>	Effective Daily Recovery Capacity
<b>EPA</b>	Environmental Protection Agency
<b>FOSC</b>	Federal On Scene Coordinator
<b>FRP</b>	Facility Response Plan
<b>FWPCA</b>	Federal Water Pollution Control Act
<b>HAZWOPER</b>	Hazardous Waste Operations and Emergency Response
<b>kts</b>	Knots; unit of speed
<b>MISLE</b>	Marine Information for Safety & Law Enforcement

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<b>MMPD</b>	Maximum Most Probable Discharge
<b>mph</b>	Miles Per Hour; unit of speed
<b>MSU</b>	Marine Safety Unit
<b>NM</b>	Nautical Miles
<b>NOAA</b>	National Oceanic and Atmospheric Administration
<b>NSFCC</b>	National Strike Force Coordination Center
<b>OPA 90</b>	Oil Pollution Act of 1990
<b>OSHA</b>	Occupational Safety and Health Administration
<b>OSRO</b>	Oil Spill Removal Organization
<b>PAV</b>	Preparedness Assessment Visit
<b>PREP</b>	National Preparedness for Response Exercise Program
<b>RRI</b>	Response Resource Inventory
<b>TSC</b>	Temporary Storage Capacity
<b>VMD</b>	Volume Median Diameter
<b>VRP</b>	Vessel Response Plan
<b>WCD</b>	Worst Case Discharge

APPENDIX B. Glossary Terms

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<b>Alternate Classification City (ACC)</b>	A designated geographic location along the U.S. coastline used in addition to or in lieu of a COTP city for an OSRO classification. The following cities are identified as ACCs: Cape Fear River, NC; Huntington, WV; Paducah, KY; Panama City, FL; Port Canaveral, FL; Toledo, OH; Cleveland, OH; Oswego, NY; Marquette, MI; Traverse City, MI; Alpena, MI; Chicago, IL; Eureka, CA; Morro Bay, CA; Cape Flattery, WA; Coos Bay, OR; Portland, OR; American Samoa; Kodiak, AK; Prudhoe Bay, AK; Nome, AK; Unalaska, AK; Ketchikan, AK; Sitka, AK; Yakutat, AK.
<b>Area Contingency Plan (ACP)</b>	The plan prepared by an Area Committee that is developed to be implemented in conjunction with the NCP and RCP, in part to address removal of a worst case discharge and to mitigate or prevent a substantial threat of such a discharge from a vessel, offshore facility, or onshore facility operating in or near an area designated by the President of the United States.
<b>Captain of the Port (COTP) Zone</b>	A zone specified in 33 CFR § 3 and, for coastal ports, the seaward extension of that zone to the outer boundary of the EEZ.
<b>Classification</b>	A process for identifying OSRO capability within geographic locations on the basis of its ownership and/or control of specialized equipment and trained personnel used in the removal of oil from the area.
<b>Containment Boom</b>	Boom that is used to collect and hold oil on the surface of the water for recovery by skimmers or similar collection devices. The regulations require containment boom equal to 1,000 feet or twice the length of the largest vessel served, plus sufficient boom for the efficient operation of recovery devices. For classification, an OSRO is expected to have 1,000 feet of containment boom for each operating area in which it operates, plus 300 feet of containment boom for each recovery system used in its classification.
<b>Contract</b>	A written contractual agreement between the OSRO and its subcontractors. The agreement must identify and ensure the availability of specified personnel and response equipment, within stipulated response times, in the specified geographic areas.
<b>Daily Mission Planner 2 (DMP2)</b>	The NOAA dispersant planning calculator that is available online at <a href="http://response.restoration.noaa.gov/oilaid/spilltool/st_info.html">http://response.restoration.noaa.gov/oilaid/spilltool/st_info.html</a> . The NSFCC will use the DMP2 as specified in regulations to evaluate an OSRO submitted list that identifies sufficient and appropriately trained personnel, vessels, delivery systems, dispersant, and any other input parameters specified in the calculator.

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<b>Dedicated Response Resources</b>	Equipment and personnel dedicated primarily to oil spill response, cleanup, and spill containment. Such equipment and personnel are not utilized for any other activity that would adversely affect their ability to provide oil spill response services.
<b>Dispersant Application Platform</b>	Vessels and aircraft outfitted with dispersant-application equipment acting as the delivery system for the dispersant onto the oil spill.
<b>Dispersant</b>	Chemical agents that emulsify, disperse, or solubilize oil into the water column or promote the surface spreading of oil slicks to facilitate dispersal of the oil into the water column. Those products of a type that is listed on the National Oil and Hazardous Substances Pollution Contingency Plan Product Schedule (40 CFR Part 300), maintained by the Environmental Protection Agency.
<b>Effective Daily Application Capacity (EDAC)</b>	The estimated amount of dispersant that can be applied to a discharge by an application system given the availability of supporting dispersant stockpiles.
<b>Effective Daily Recovery Capacity (EDRC)</b>	The calculated capacity of oil recovery devices as determined by using a formula defined in 33 CFR §154, Appendix C and 33 CFR § 155, Appendix B that accounts for limiting factors such as daylight, weather, sea state, and emulsified oil in the recovered material.
<b>Great Lakes</b>	Operating area that includes Lakes Superior, Michigan, Huron, Erie, and Ontario; their connecting and tributary waters; the Saint Lawrence River as far as Saint Regis; and adjacent port areas.
<b>Gulf Coast Region</b>	The region encompassing the following COTP zones: Corpus Christi, TX; Houston/Galveston, TX; Port Arthur, TX; Morgan City, LA; New Orleans, LA; Mobile, AL; St. Petersburg, FL.
<b>Higher Volume Port Areas</b>	Ports listed in 33 CFR § 154.1020 and 33 CFR § 155.1020, including, any water area within 50 nautical miles seaward of the port.

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**Inland Area**

The environment inland of the coastal zone excluding the Great Lakes and specified ports and harbors on inland rivers. The term inland zone delineates an area of federal responsibility for response action. Precise boundaries are determined by EPA/USCG agreements and identified in federal regional contingency plans. The operating area shoreward of the boundary lines (except in the Gulf of Mexico) defined in 46 CFR Part 7. In the Gulf of Mexico, it means the area shoreward of the line of demarcation (COLREG lines) as defined in 33 CFR § 80.740–80.850. The inland operating area does not include the Great Lakes.

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**Letter of Intent**

A document that identifies the personnel, equipment, and services capable of being provided by another commercial source to the OSRO within the stipulated response times in the specified geographic areas. It sets out the parties' acknowledgement that the commercial source intends to commit the resources in time of a response and that they agree to permit the Coast Guard to verify the availability of the identified response resources through notification drills, review of contracts, and site visits.

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**Maximum Most Probable Discharge (MMPD)**

For a facility, a discharge of 1,200 barrels or 10% of the volume of a WCD, the lesser number.

For a tank vessel with a capacity equal to or greater than 25,000 barrels of oil, a discharge of 2,500 barrels.

For a tank vessel with a capacity of less than 25,000 barrels, a discharge of 10% of the tank vessel's oil cargo capacity.

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**Mobilization**

The time it takes to get the resources assembled and prepared at the staging site. Mobilization begins when notification ends and ends when the resources are ready to move off-site.

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**Near shore**

The operating area extending seaward 12 nautical miles from the boundary lines (except in the Gulf of Mexico) defined in 46 CFR 7. In the Gulf of Mexico, it means the area extending seaward 12 nautical miles from the line of demarcation (COLREG lines) as defined in Sections 80.740–80.850 of 33 CFR § Chapter I.

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**Non-dedicated Response Resources**

Response resources with service that is not limited exclusively to oil or hazardous substance spill response-related activities.

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<b>Non-Persistent or Group I Oil</b>	<p>A petroleum-based oil that, at the time of shipment, consists of hydrocarbon fractions:</p> <p>At least 50% of which by volume distills at a temperature of 340°C (645°F) and 95% of which by volume distills at a temperature of 370°C (700°F)</p>
<b>Ocean</b>	<p>The near shore, offshore, and open ocean operating areas as defined in these guidelines.</p>
<b>Offshore</b>	<p>The operating area up to 38 nautical miles seaward of the outer boundary of the near shore area (12–50 NM).</p>
<b>Oil Spill Removal Organization (OSRO)</b>	<p>Any person or persons who own or otherwise control oil spill removal resources that are designed for, or are capable of, removing oil from the water or shoreline. Control of such resources through means other than ownership includes leasing or subcontracting of equipment or, in the case of trained personnel, by having contracts, evidence of employment, or consulting agreements. OSROs provide response equipment and services, individually or in combination with subcontractors or associated contractors, under contract or other means approved by the President, directly to an owner or operator of a facility or tank vessel required to have a response plan under 33 USC 1321(j)(5). OSROs must be able to mobilize and deploy equipment or trained personnel and remove, store, and transfer recovered oil. Persons such as sales and marketing organizations (e.g., distributorships and manufacturer’s representatives) that warehouse or store equipment for sale are not OSROs.</p>
<b>Open Ocean</b>	<p>The operating area seaward of the outer boundary of the offshore operating area to the seaward boundary of the Economic Exclusive Zone (50–200 NM).</p>
<b>Operating Area</b>	<p>Rivers/canals, Great Lakes, inland, near shore, offshore, or open ocean. These terms are used to define the geographic location(s) in which a facility or tank vessel is handling, storing, or transporting oil.</p>
<b>Operating Environment</b>	<p>Rivers/canals, Great Lakes, inland, or ocean. These terms are used to define the conditions in which response equipment is designed to function.</p>
<b>Other Approved Means</b>	<p>For the purposes of these guidelines, means a Letter of Intent as defined in this Glossary.</p>
<b>Owned Resources</b>	<p>Equipment that belongs solely to the OSRO or personnel directly employed by the OSRO submitting an application for classification.</p>

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<b>Persistent Oil</b>	<p>A petroleum based oil that does not meet the distillation criteria for non-persistent oil. For the purposes of these guidelines, persistent oils are further classified based on specific gravity as follows:</p> <p>Group II: specific gravity less than 0.85</p> <p>Group III: specific gravity between 0.85 and less than 0.95</p> <p>Group IV: specific gravity 0.95 to and including 1.0</p> <p>Group V: specific gravity greater than 1.0</p>
<b>Pre - authorization</b>	<p>Means an agreement, adopted by a regional response team or an area committee, which authorizes the use of dispersants at the discretion of the Federal On-Scene Coordinator without the further approval of other Federal or State authorities. These pre-authorization areas are generally limited to particular geographic areas within each region.</p>
<b>Primary Staging Site</b>	<p>Means a site designated within a Captain of the Port zone that has been identified as a forward staging area for dispersant application platforms and the loading of dispersant stockpiles. Primary staging sites are typically the planned locations where platforms load or reload dispersants before departing for application at the site of the discharge and may not be the locations where dispersant stockpiles are stored or application platforms are home-based.</p>
<b>Protective Boom</b>	<p>Boom used for deflecting/diverting or otherwise influencing oil on the water surface away from sensitive environments, often but not always toward containment sites.</p>
<b>Resource Site</b>	<p>A location where personnel and pollution response equipment are staged.</p>
<b>Response Resource Inventory (RRI)</b>	<p>The database of oil spill response resources developed by the Coast Guard to meet requirements of OPA 90.</p>
<b>Response Resources</b>	<p>The personnel, equipment, supplies, and other capabilities necessary to perform the response activities identified in an FRP or VRP.</p>

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<b>Rivers/canals</b>	Operating area that includes bodies of water confined within the inland area, including the Intracoastal Waterways and other waterways artificially created for navigation, that have a project depth of 12 feet or less.
<b>Skimming Systems</b>	Devices used to remove spilled oil from the surface of the water through means of mechanical suction, adhesion, absorption, adsorption, or some similar mechanism of action that allows separation and recovery of spilled oil from the water's surface. Skimmers may be self-propelled, towed, or pushed through the water.
<b>Systems Approach</b>	An assessment of the infrastructure and support resources that an OSRO must have to mobilize, transport, deploy, sustain, and support the equipment resources necessary for the level of response for which classified (i.e., response readiness, trained personnel, personnel recall mechanisms, trucks, trailers, response vessels, etc.).
<b>Temporary Storage Capacity (TSC)</b>	Inflatable bladders, rubber barges, certificated barge capacity, or other temporary storage that is capable of being utilized on-scene at a spill response and is designed and intended for storage of flammable or combustible liquids. It does not include tank vessels or barges-of-opportunity for which no prearrangements have been made. Fixed shore-based storage capacity, ensured available by contract or other approved means, is acceptable in limited circumstances.
<b>Tiers 1, 2, and 3</b>	The combination of response resources and the times within which the resources must be capable of arriving on-scene to meet WCD resource requirements as defined in 33 CFR § 154.1020 and 33 CFR § 155.1025.
<b>Worst Case Discharge (WCD)</b>	As defined by section 311(a)(24) of the CWA, means, in the case of a vessel, a discharge in adverse weather conditions of its entire cargo, and, in the case of an offshore facility or onshore facility, the largest foreseeable discharge in adverse weather conditions.

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April 2013

APPENDIX C. Forms

A. Mechanical Field Verification Checksheet

Date of Visit: _____ COTP Zone _____ Initial Visit _____ or Follow up _____ Company Name: _____ Site Address: _____
<b>UNITED STATES COAST GUARD</b> <b>NATIONAL STRIKE FORCE COORDINATION CENTER</b> <i>Mechanical Field Verification Checksheet</i>
<b><u>Verification Team</u></b> NSFCC Team: _____ Sector Rep: _____ Sector Rep: _____ Other: _____ State Rep: _____
<p>The following report summarizes the changes of response resources at the above listed site since the last OSRO verification visit. Based on these results, classification may be changed unless additional information is submitted to the National Strike Force Coordination Center (NSFCC). If no additional information is submitted within 60 days of the verification date, your OSRO classification will be recalculated using this verification data. Further information regarding the USCG OSRO Classification Program may be obtained at <a href="http://www.uscg.mil/hq/nsfweb/nsfcc/ops/ResponseSupport/RRAB/rrab.html">http://www.uscg.mil/hq/nsfweb/nsfcc/ops/ResponseSupport/RRAB/rrab.html</a></p>
<b><u>Site Changes/ Additional Comments</u></b>  1. _____ 2. _____ 3. _____ 4. _____ 5. _____  _____ _____ _____ Verification Inspector (s)
National Strike Force Coordination Center 1461 N Road Street (US 17 N) Elizabeth City, NC 27909 Attn: Response Resource Assessment Branch (252) 331- 6000 ext 3034/3004/3057/3031 (252) 331- 6012 (fax)

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B. Dispersant Field Verification Checksheet

Date of Visit: _____ COTP Zone _____ Initial Visit _____ or Follow up _____	
Company Name: _____	
Site Address: _____	
<b><u>Platform Type</u></b>	
Type: _____	Quantity _____
Provider (if owned notate): _____	
Location: _____	
Distance to Primary staging site (Miles): _____	
Dispersant payload for platform: _____	
<b><u>Platform Type</u></b>	
Type: _____	Quantity _____
Provider (if owned notate): _____	
Location: _____	
Distance to Primary staging site (Miles): _____	
Dispersant payload for platform: _____	
<b><u>Platform Type</u></b>	
Type: _____	Quantity _____
Provider (if owned notate): _____	
Location: _____	
Distance to Primary staging site (Miles): _____	
Dispersant payload for platform: _____	
<b><u>Platform Type</u></b>	
Type: _____	Quantity _____
Provider (if owned notate): _____	
Location: _____	
Distance to Primary staging site (Miles): _____	
Dispersant payload for platform: _____	
_____ _____ _____ _____ Verification Inspector (s)	National Strike Force Coordination Center 1461 N Road Street (US 17 N) Elizabeth City, NC 27909 Attn: Response Resource Assessment Branch (252) 331- 6000 ext 3034/3004/3057/3031 (252) 331- 6012 (fax)

C. Sample of Average Most Probable Discharge (AMPD) Information – Facility Response Plan

**AMPD Response Coverage Information for** \_\_\_\_\_ (company name)

1. **AMPD response provider** (check one): \_\_\_ Plan Holder \_\_\_ OSRO

If OSRO, company name(s)	Expiration date (Contract/other approved means)
Primary: _____	/ /
_____	/ /
_____	/ /

2. **Equipment deployment personnel** are (check one):  
 \_\_\_\_\_ Located at equipment site \_\_\_\_\_ on recall

3. **Physical location** (street address) of AMPD equipment (boom/skimmer/temporary storage) and qualified deployment personnel.

Equipment Address (\*1 hour response time):

**Boom:** \_\_\_\_\_

Equipment Address (\*2 hour response time):

**Skimmer:** \_\_\_\_\_

**Temporary Storage:** \_\_\_\_\_

*\*Planning Assumptions: On-water speed - 5 knots, land speed - 35 miles per hour; notifications/mobilization – 30 mins*

**This is an example to assist with AM PD.**

**Not intended for GIUE equipment deployment documentation**

D. Sample of Average Most Probable Discharge (AMPD) Information – Vessel Response Plan

1. **AMPD Response Coverage for COTP Zone:** \_\_\_\_\_ for (check one)

All vessels in plan

Vessel name(s): \_\_\_\_\_

2. **AMPD Response provider** (check one):  Plan Holder  OSRO

a) **If OSRO**, company name: \_\_\_\_\_ Exp. date (Contract/other approved means)

\_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

b) Vessel conducts transfers (check one):

At MTR Facilities **only**  During Lightering/Bunkering Operations **only**  Both

3. **Equipment deployment personnel** are (check one):

Located at equipment site  on recall

4. **Physical location** (street address) from which AMPD equipment will be dispatched in the event of an oil spill:

a) Boom (\*1 hour response time): \_\_\_\_\_

b) Skimmer (\*2 hour response time): \_\_\_\_\_

c) Temporary Storage: \_\_\_\_\_

*\*\*\*AMPD information should be provided for each COTP zone in which vessels operate and for each AMPD provider offering coverage in a zone\*\*\**

*\* Planning Assumptions: On-water speed - 5 knots, land speed - 35 miles per hour; notifications/mobilization – 30 mins*

**This is an example to assist with AMPD.**

Not intended for GIUE equipment deployment documentation.