

RRT III Fact Sheet

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Oil Spill Removal Organization Classification Program

What is the Purpose of the Oil Spill Removal Organization (OSRO) Program?

The Oil Spill Removal Organization (OSRO) classification process was developed to facilitate the preparation and review of Vessel and Facility Response Plans (VRPs & FRPS). Section 4202 of the Oil Pollution Act of 1990 (OPA 90) amended the Clean Water Act (CWA) to require the preparation and submission of response plans for all vessels defined as "tank vessels" under Title 46 of U.S. Code, Part 2101 and for certain oil-handling facilities. An owner or operator who is required to submit a response plan must, among other things, identify and ensure by contract, or other approved means, the availability of private personnel and equipment necessary to remove, to the maximum extent practicable, a worst case discharge (including a discharge resulting from fire or explosion), and to mitigate or prevent a substantial threat of such a discharge.

The magnitude of the investment in specialized oil recovery equipment, temporary storage capacity, transporting oil for disposal, and in training sufficient numbers of personnel to remove such a discharge, in all foreseeable locations and operating environments, is unprecedented for marine environmental response preparation. The system for assembling, mobilizing, and

controlling these resources is extremely complex. To meet the statutory requirements, each response plan must identify the means for accomplishing these tasks.

The OSRO classification process represents standard guidelines by which the Coast Guard and plan developers can evaluate an OSRO's potential to respond to and recover oil spills of various sizes. Plan holders that arrange for the services of a Coast Guard classified OSRO do not have to list their response resources in their plans.

OSRO Classification Process Applicability

The OSRO classification process is a strictly voluntary process in which OSROs can participate and plan holders can utilize for planning purposes. An OSRO does not have to be classified and owners or operators do not have to limit their response resources to Coast Guard classified OSROs. As already indicated, however, plan holders that use Coast Guard classified OSROs are exempt from the requirement to list their response resources in their plans. Coast Guard classification of an OSRO does not relieve an owner or operator of their ultimate statutory responsibility to ensure the adequacy of the spill response resources identified in a response plan.

Geographic Specific Classification

The Coast Guard's National Strike Force Coordination Center (NSFCC) classifies OSROs by Captain of the Port (COTP) zones. Classification is assigned based on the information supplied by each OSRO for inclusion in the computer based Response Resource Inventory (RRI). Participation in the RRI is mandatory, for an OSRO to receive classification. Using response times and discharge quantities specified in the facility and vessel response plan regulations (33 CFR 154/155), and using equipment requirements as specified in the regulations, NSFCC determines the appropriate classification (s) for each OSRO applicant in each COTP zone. The RRI program automatically takes into account the response capability of an OSRO (using travel speeds specified in the regulations). If an OSRO applicant desires to limit its response capability to a selected COTP zone(s), it should indicate so on their application.

OSRO classifications for each COTP zone are based on a specific geographic location. This location is either the latitude and longitude of the COTP city or the coordinates of a city within the COTP zone that an OSRO specifies. For oceans classification, a position 50 nautical miles seaward of the port entrance (COTP city or specified city) is used. The Coast Guard issued classification is only an indication of an OSRO's capability to respond within a COTP zone. Plan holders

must utilize an OSRO's capable of meeting specific response needs.

The vessel and facility response 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 resources (dedicated, non-dedicated, owned and non-owned equipment and personnel) that they claim for classification, including temporary storage and vessels intended to deploy resources. Even though dedicated resources are ideal, OSROs may utilize non-dedicated resources. For use of non-dedicated resources, there must be a redundancy factor of 2: 1. All response times are based on the time of discovery of a discharge. Response times, travel speeds, and the ability to provide recovery systems are all factors in the classification of OSROs. Plan holders must evaluate OSROs based on distances stated in the regulations. OSROs that have designated equipment to meet State resident equipment requirements must note this on their application and that equipment cannot be deployed outside of its designated area.

OSRO Classification Evaluation

The three components evaluated to classify an OSRO within specific classification levels are: containment, recovery, and storage devices.

Classification will be issued based upon the response system capability documented by the applicant and verified by the Coast Guard. An OSRO's classification is limited by the lowest rated component of the recovery system. Even though containment recovery, and storage devices are used for classification purposes, they alone do not

constitute a response system. Other equally important components that are evaluated as part of the system include:

- Personnel with appropriate training;
- Proper equipment for the operating environment;
- Logistical/sustainability capability; and
- Alternate response techniques (only if an OSRO claims this capability in order to reduce a plan holder's mechanical recovery requirements).

OSRO Classifications

OSROs are classified geographically with letter designations, "J" through "E", by removal capacity and response times. OSROs are also classified for four different operating environments:

- Rivers and canals;
- Inland;
- Great Lakes; and
- Oceans.

The oceans operating environment includes near-shore, offshore, and open ocean operating areas. The equipment operating parameters for the three operating areas incorporated into oceans are the same. For VRP/FR-P planning purposes, however, the three operating areas incorporated in the oceans classification have different removal capacities and mobilization calculation factors. Plan holders must be aware of the distinction between operating environments and operating areas. Each classification stands on its own. The "E" classification does not automatically include the capability to meet the requirements for "A", "B", "C", or "D".

Classification does not predict operational performance or relieve

an owner or operator from the requirement to consider response times and cargo volumes in the planning process. The use of a classified OSRO does not relieve an owner or operator of the statutory responsibility to effectively and promptly remove spilled oil from the environment.

OSRO Application Process

Any entity may apply for OSRO classification. The Coast Guard classifies applicants on the basis of their estimated capacity to remove oil from the marine environment. An OSRO seeking classification shall supply information about its equipment and personnel inventory. Applicant should identify the area targeted for resource deployment and indicate on the application if they do not want public availability of their data. An OSRO applicant may request an application form or submit an application to the following address:

National Strike Force Coordination Center (Attn: OSRO Classification Review) 1461 U.S. 17 North Elizabeth City, NC 27909

The NSFCC can be reached by telephone at (919) 331-6000 or by facsimile at (919) 331-6012

A classified OSRO shall notify, within 24 hours, the NSFCC and the COTP of the zone in which the OSRO's resources are located of significant changes in response capability, that might effect the classification and the OSRO's ability to respond to a spill as planned. A significant change is a reduction in the OSRO's classified capacity by a factor of 10% for a period of 48 hours or longer.

Resource Assessment

After completing the review of the information provided by the

applicant, the Coast Guard will issue an interim letter of classification identifying: removal capacity, operating environment(s), and COTP zones(s). The interim letter will remain in effect until a verification visit is conducted. A final classification letter, valid for three years, will be issued upon completion of verification visits and final review.

Suspension or Revocation of OSRO Classifications

Results from visits, exercises, spot checks, actual responses, or information gathered during normal business, may give the Coast Guard reason to suspend or revoke an interim or final classification. In these instances an OSRO would be notified in writing and given an opportunity to justify the keeping of their classification. If final suspension or revocation actions are taken the OSRO may appeal NSFCC decisions to:

Commandant (G-MOR-3)
U.S. Coast Guard
2100 Second Street, S.W.
Washington, D.C. 20593-0001
(202) 267-2611

Review for reclassification may be initiated by either the Coast Guard or the OSRO.

Inspection and Verification

After reviewing the application and issuing an interim classification, the Coast Guard will visit the OSRO and inspect and validate the resources identified in the application. A final classification will be issued upon completion of verification visits. The primary purpose of the verification visits is to audit the OSRO's equipment and personnel inventory, inspect personnel training records, inspect equipment maintenance records, verify agreements for non-

owned resources, verify equipment condition, and to conduct an overall assessment of the accuracy of the OSRO's representations. If the OSRO's equipment and personnel status does not accurately reflect the information provided in the application, the Coast Guard will issue the final classification at a level which appropriately reflects its actual resources.

OSRO Reinspection

At the end of the three year classification period, an OSRO will be revisited by the Coast Guard in order to maintain its classification. In between verification visits, the Coast Guard will conduct random spot checks to confirm resource availability and equipment operability.

Please contact our RRT Coordinator through the web site or at (757) 398-6620 for more information.