United States Department of
Homeland Security

United States
Coast Guard

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

June 2026

Table of Contents

Executive Summary 4
CHAPTER 1. Classification Process and Requirements 5
A. OSRO Classification Program: Background 5
B. History and Significant Revisions to the OSRO Guidelines 5
C. Application Process 6
D. Alternative Compliance 10
E. Alternate Classification Cities 12
F. OSRO Exercises 14
G. Personnel Training 15
H. Equipment Maintenance 15
I. Resource Requirements 16
J. Response Times 16
K. Status Changes in Equipment or Capabilities 17
L. OSRO Guidelines Biennial Review 18
CHAPTER 2. Preparedness Assessment and Verification (PAV) Visits 19
A. Introduction and Purpose 19
B. Roles and Responsibilities 19
C. Types and Frequency of Preparedness Assessment and Verification Visits 21
D. Preparedness Assessment and Verification Visit Process 22
E. Personnel Training 23
F. Examination of Equipment Systems and Maintenance Records 23
G. Preparedness Assessment and Verification Visit Equipment Criteria 23
H. Preparedness Assessment and Verification Visit Results 27
I. Other Reasons for Downgrading an OSRO's Classification 28
CHAPTER 3. Mechanical Classification Requirements for OSROs 29
A. Overview 29
B. Resource Requirements 29
C. Protective Boom 29
D. Oil Recovery Device Operating Environment 29
E. EDRC and Containment Boom 29
F. Temporary Storage Capacity 30
G. Response Vessels 31
H. Response Aircraft 31
I. MMPD and WCD Tier 1 Classification 32
J. WCD Tier 2 and WCD Tier 3 Classifications 32

K. Planning Volumes 32
L. Response Times 34
CHAPTER 4. Mechanical Classification Standards by Operating Area 35
A. Operating Areas 35
B. Adverse Weather Considerations 35
C. Shallow Water Requirements 36
D. Rivers and Canals 37
E. Great Lakes 38
F. Inland 39
G. Near Shore 40
H. Offshore 41
I. Open Ocean 42
CHAPTER 5. OSRO Classification Dispersant Program 44
A. Introduction 44
B. Response Plan Requirements 44
C. Tier 1, 2, and 3 Worst Case Discharge (WCD) Classifications. 44
D. Effective Daily Application Capacity 45
E. Location and Documentation of Dispersant Resources 46
F. Captain of the Port Zones 47
G. Travel Time 47
H. Dispersant Application Platform 47
I. American Society for Testing and Materials Standards 47
J. Aerial Oil Tracking and Application Capabilities for Dispersant Use 48
K. Personnel 49
L. Response Times and Dispersant Stockpiles 49
M. Estimated Dispersant System Potential Calculations 50
CHAPTER 6. OSRO Classification Guidelines for Non-Floating Oils 51
A. Overview 51
B. Non-Floating Oils Classification Evaluation 52
C. Application for Non-Floating Oils Classification 53
D. Non-Floating Oil Procedures and Core Equipment Standards 54
E. Resource Requirements 57
APPENDIX A. List of Acronyms 60
APPENDIX B. Glossary Terms 63

Executive Summary

The 2026 revision of the Oil Spill Removal Organization (OSRO) Classification Guidelines focuses on maintaining the integrity of the program and provides minor technical amendments including clarifications to the classification process, including Response Resource Inventory (RRI) entries, and to the preparedness assessment and verification visit procedures. A section has been added to reinforce the importance of the Government Initiated Unannounced Exercise (GIUE) program and describes the linkage between GIUEs and participation in the OSRO Classification Program.

The OSRO classification program was created by the Coast Guard to assist facility and vessel response plan holders in the writing of their plans. The sole regulatory benefit that plan holders receive from utilizing Coast Guard classified OSROs is the relief from providing voluminous detailed lists of response resources in their plans. The OSRO classification program was created to be and remains a voluntary program. Volunteer organizations simply receive their classifications as outlined in these guidelines but are neither endorsed, certified, nor recommended by the Coast Guard. It is the plan holder's responsibility to ensure the OSRO, regardless of their classification, is able to meet their specific planning requirements.

Although participation in the OSRO classification is voluntary, it is critical that participating OSROs ensure their resources are accurately reflected in the Response Resource Inventory (RRI) at all times. Maintaining an accurate inventory in the RRI is a requirement for participation in the classification program. The success of the program relies on the real-time capture of OSRO capabilities at their specified sites, which determines the classifications that plan holders cite in their response plans.

Real-world incidents have shown that this program directly contributes to rapid and well-coordinated responses. However, the OSRO classification does not guarantee performance, nor does the use of a Coast Guard-classified OSRO relieve plan holders of their responsibility to ensure the adequacy of response resources. It cannot be emphasized enough that **it is the sole responsibility of the plan holder to ensure their contracted OSRO, regardless of classification, is able to meet their planning requirements.** Plan holders must continue to conduct a plan-by-plan and vessel-by-vessel review of identified resources provided by their OSROs to validate that the resources available under the contract are sufficient to meet their planning requirements, even if an OSRO has a given classification for a specific operational area.

We continue to refine the connectivity between response and preparedness. We encourage all OSROs to provide input and lessons learned to the Coast Guard's Office of Marine Environmental Response Policy (CG-MER) and the National Strike Force Coordination Center (NSFCC) through their professional organizations or directly.

Thank you for all your continued commitment to oil spill response excellence and to the protection of the environment. While no one desires an incident, it is heartening to be able to rely on the expertise and professionalism of the oil spill response community. Semper Paratus! Always Ready!

K R Trego

Digitally signed by
TREGO.KIRSTEN.ROSLYN.1045436426
Date: 2026.06.22 10:59:21 -04'00'

U.S. Coast Guard
Acting Chief
Office of Marine Environmental Response Policy

MOBERLEY.CAROLYN.L.1014540152

Digitally signed by
MOBERLEY.CAROLYN.L.1014540152
Date: 2026.06.22 12:22:13 -04'00'

Captain, U.S. Coast Guard
Commanding Officer
National Strike Force Coordination Center

CHAPTER 1. Classification Process and Requirements

A. OSRO Classification Program: Background

1. Section 311(j) of the Federal Water Pollution Control Act (FWPCA), amended by section 4202 of the Oil Pollution Act of 1990 (OPA 90), requires 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" and "non-tank vessels" (hereafter referred to as plan holders). The system for assembling, mobilizing, and controlling response resources is extremely complex, therefore, to meet the statutory requirements, each response plan holder must identify the means for accomplishing these tasks. The regulations in 33 Code of Federal Regulations (CFR) 154 and 155 set forth specific requirements for these response plans. Plan holders are required to submit a response plan that identifies and ensures 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 (WCD), including a discharge resulting from fire or explosion, and to mitigate or prevent a substantial threat of such a discharge.
2. The voluntary OSRO classification program, administered by the NSFCC, was established to alleviate the need for a plan holder to include extensive itemized lists of response resources within their plans. Instead, a plan holder could simply list a classified OSRO by name in their response plan if the classified OSRO(s) met the plan holder's specific planning requirements.
3. When an OSRO is classified by the Coast Guard, it means that the OSRO has voluntarily agreed to participate in the program, the OSRO has documented their detailed list of resources in the Coast Guard's RRI database, the OSRO's resources have been evaluated by the NSFCC, and the OSRO's capacity has been determined to equal or exceed the minimum response capability caps by operating area set forth in 33 CFR § 154 and 33 CFR § 155.
4. The RRI is the backbone of the classification program. The RRI's capabilities are two-fold: having a resource inventory component and a classification calculation component. The inventory component of the RRI provides Captains of the Port (COTP), Federal On-Scene Coordinators (FOSC), and contingency planners the ability to query available spill response equipment and its proximity to set locations within a COTP zone (either COTP office location or alternate classification city location). The classification calculation component utilizes the resource inventory data entered into the RRI by an OSRO to calculate and classify the OSRO's response capability up to the minimum regulatory response capability caps and national planning criteria calculations set forth in 33 CFR § 154 and 33 CFR § 155.
5. The plan holders use of a Coast Guard classified OSRO does not, in any way, relieve the plan holder of their responsibility to ensure that specific statutory response times are met. The OSRO classification was intended strictly as a planning tool, serving as an indicator of an OSRO's response capabilities. This tool should not be equated with a certification program, and it should **NOT** be assumed that a classified OSRO would guarantee performance during all responses. The listing of a classified OSRO is only the starting point to gauge response capability. Therefore, periodic performance testing must be conducted to confirm an OSRO's capability.

B. History and Significant Revisions to the OSRO Guidelines

1. The OSRO Classification Program was developed in 1992 to increase the efficiency of the OSRO selection and validation process derived from OPA90 regulatory requirements. The original Classification Program considered three principal elements to assess an OSRO's overall capability for spill response and generated a classification: (1) amount and size of boom; (2) effective daily recovery

capacity (EDRC); and (3) temporary storage capacity owned or controlled by the OSRO. These elements were further scrutinized for suitability in four different operating environments: river/canal, inland/near shore, Great Lakes, and offshore/open ocean. In 1995, the guidelines incorporated time requirements for the OSRO to deliver its capability from its equipment sites to the individual Coast Guard COTP zone in which it was seeking classification. Classifications were now specific to COTP zones and operating areas. In addition, the 1995 revision required that OSRO resource information must be submitted using the RRI data collection program.

2. The April 2001 revision and subsequent June 2002 addendum expanded the four operating areas into six operating areas. It eliminated Average Most Probable Discharge classifications and incorporated Maximum Most Probable Discharge (MMPD) through WCD Tier 3 classifications. In addition, the guidelines introduced Alternate Classification Cities (ACCs) within COTP zones to stimulate increases in classified OSRO coverage for geographically expansive COTP zones. Further, the guidelines added time delivery parameters to calculate response times based on whether companies had personnel on-site 24 hours a day, capable of mobilizing and deploying equipment upon notification, and whether the equipment being used was owned, contracted, or obtained for company use by other approved means.
3. In 2008, the guidelines incorporated guidance on Dispersant Providing OSROs. In 2013, revised guidelines were published that incorporated dispersant classification requirements and application process. In 2016, the guidelines incorporated the classification requirements and application process for non-floating oils. In 2019, the guidelines were updated to better align with regulatory requirements including the elimination of exceptions and waivers which were not permissible under the existing statutes/regulations. The guidelines clarified that the alternative compliance program consistent with 33 CFR §§ 154-155 continued to remain a part of the guidelines
4. The 2021 OSRO Classification Guidelines revision clarified the intent of the contracted temporary storage capacity calculations, affirming that non-dedicated temporary storage could only be counted towards the classification requirements when it is available to meet response time requirements. Therefore, non-dedicated storage must be regularly operated within the COTP zone or ACC to be considered for classification. In addition, clarifications were made regarding non-floating oil OSRO applications, requiring OSROs to maintain an equipment inventory sufficient to perform services across the full range of the operating area and operating environment sought.
5. In this 2026 revision of the OSRO Classification Guidelines, minor edits and clarifications have been made to the classification processes, including RRI entries, and clarifications to Preparedness Assessment and Verification (PAV) visit procedures. In addition, a section has been added to reinforce the importance of the Government Initiated Unannounced Exercise (GIUE) program and establishes the linkage between GIUEs and the OSRO Classification Program.

C. Application Process

1. Participation in the OSRO classification program is voluntary. However, once an OSRO elects to participate in the classification program, full compliance is mandatory to maintain the classification. Full compliance includes maintaining an accurate resource inventory and OSRO information within the RRI at all times and full participation and cooperation in PAV visits conducted by the NSFCC.
2. Classification(s) are generally based upon the response times and equipment requirements specified in the Facility Response Plan (FRP) and Vessel Response Plan (VRP) regulations and in these guidelines. The NSFCC uses the RRI to calculate and assign classification for each COTP zone or ACC requested by

an OSRO based upon the information supplied by each OSRO. An OSRO must complete all pertinent RRI data fields for an application to be accepted and participation in the RRI is mandatory for an OSRO to participate in the program and receive a classification.

3. An OSRO wishing to apply for classification should utilize the RRI website which can be found at the following link: https://cgrri.uscg.mil/.

4. First time participants should use the "Click Here to Register" link. Users will be prompted to enter initial registration information including first and last name, organization name, user email, business phone, and special comments. Comments should describe your intentions for using the RRI and intentions to participate in the voluntary OSRO classification program. Once submitted, the initial registration information is sent to the NSFCC for review. Applicants can expect to receive a follow up call or email from the NSFCC to verify your information, validate your organization as a response resource provider, and validate your intention to add your resource inventory into the RRI database. Once validated, the NSFCC will assign an OSRO identification number and provide RRI login information. You will now be able to login to the RRI as a registered user, create equipment sites, enter equipment inventories for each site, and apply for classification(s) in selected COTP zones.

5. Once an OSRO populates the RRI with their resource inventory and applies for classification, the NSFCC will review the application for approval, assign the appropriate classification(s), and schedule an initial PAV visit with the applicant. Upon approval, the NSFCC will issue an OSRO Classification Letter informing the applicant of their classification status and information on how to maintain the classification. The RRI recalculates classifications every 24 hours. As equipment is added, removed, or has a change in location, an OSRO's classification may change. OSROs, plan holders, regulators, and stakeholders should reference the RRI as the official source for the most up to date OSRO classification status.

6. Following the classification application review by the NSFCC, the NSFCC will schedule an initial PAV visit with the applicant. The NSFCC will coordinate with the appropriate COTP and District Response Advisory Team (DRAT) to schedule and conduct the PAV visit.

7. OSROs should review these guidelines prior to submitting an application, as each classification type (mechanical classification, dispersant classification, and non-floating oil classification) has specific requirements. OSROs are encouraged to reach out to the NSFCC with any questions regarding this program or these guidelines. The contact information for the NSFCC is:

   Commanding Officer
   National Strike Force Coordination Center
   ATTN: Marine Environmental Response and Preparedness Division
   1461 North Road Street, Elizabeth City, NC 27909-3241
   Tel: (206) 815-6750 / Fax: (252) 331-6012
   Email: nsfcc-pav@uscg.mil

   NSF's home page: https://www.dco.uscg.mil/Our-Organization/National-Strike-Force.

8. An OSRO may withdraw their participation from the OSRO classification program at any time by notifying the NSFCC. However, to return to the program, the OSRO must complete the full application process and be reevaluated by the NSFCC.

9. The following figures depict the evaluation and review process for becoming a classified OSRO. The timelines depicted below do not begin until the NSFCC has received all necessary documentation.

Figure 1-1: OSRO Mechanical Classification Review Process

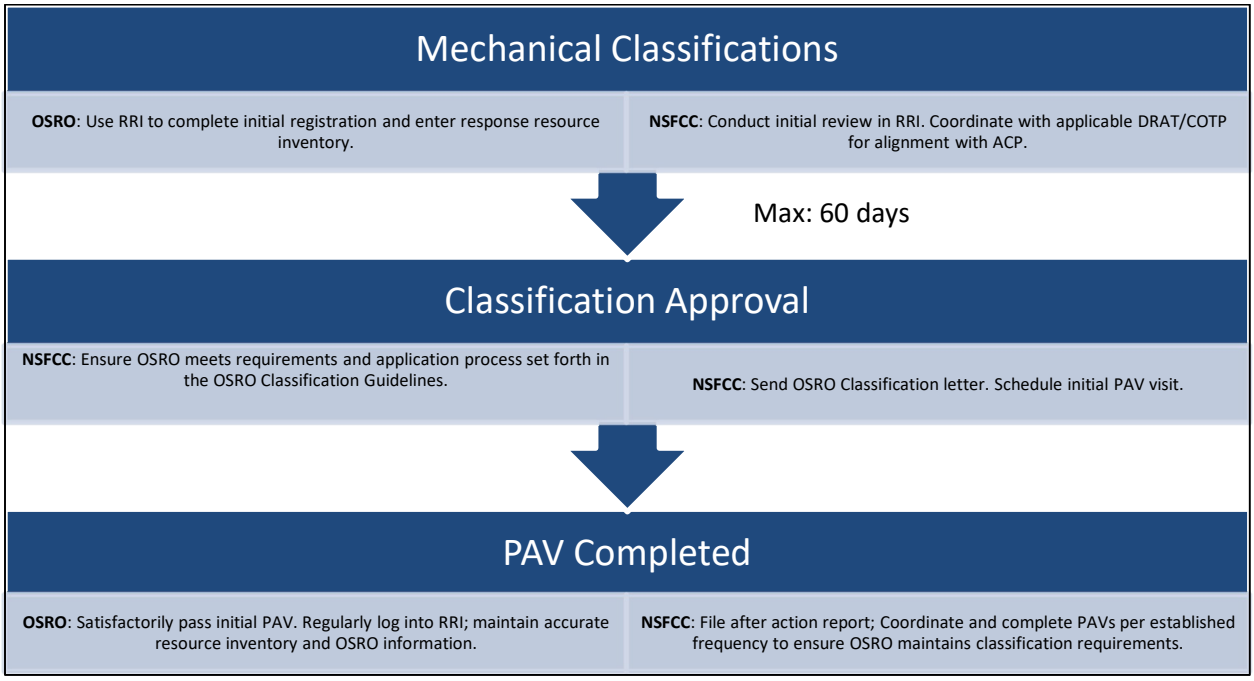


Figure 1-2: OSRO Dispersant Classification Review Process

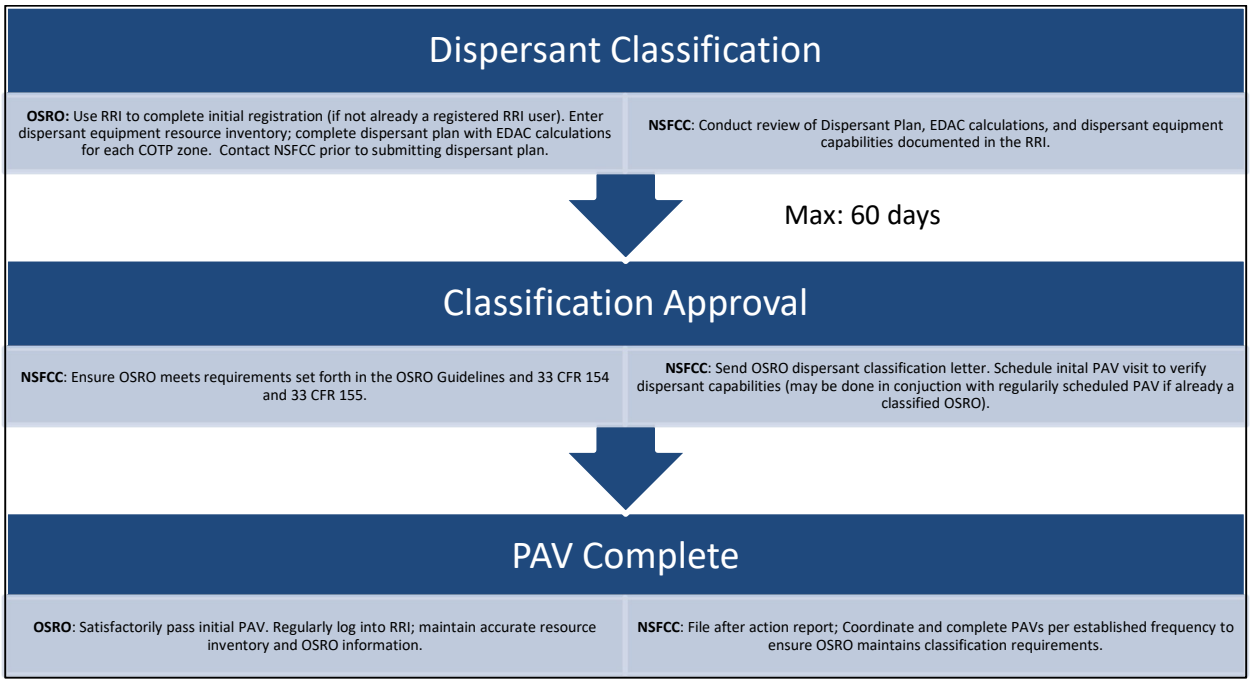
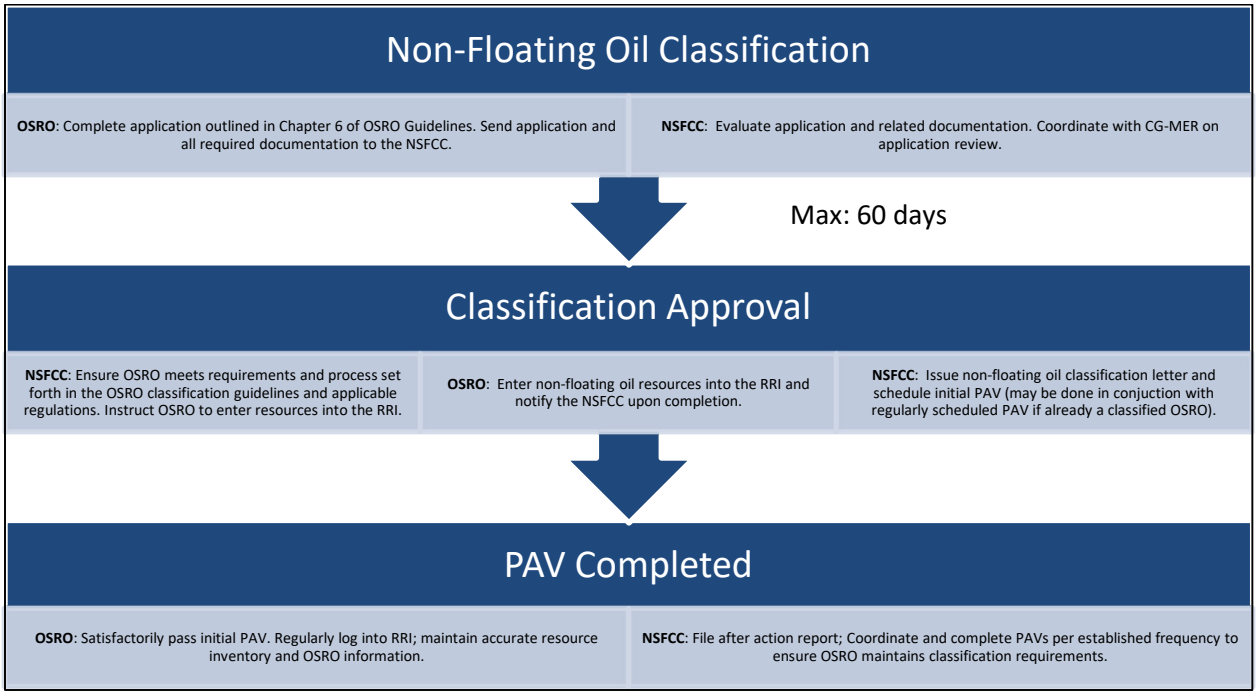


Figure 1-3: OSRO Non-Floating Oil Classification Review Process



D. Alternative Compliance

1. Previously, an OSRO was able to submit a request for an optional acceptable classification for EDRC, travel speed, TSC, and boom. However, based on a regulatory review the optional acceptable classification program has been terminated. In its place, an OSRO may apply for an alternative compliance if an OSRO feels that the standard national planning criteria calculations are not appropriate and one or more of the alternative calculations allowed by regulations (see table 1.1) are applicable and necessary. OSROs shall also document if their alternative compliance request relates to an approved or pending alternative planning criteria. OSROs shall submit requests electronically or in writing to the NSFCC. Note: Vessel response plan holders seeking alternatives for categories other than what is in Table 1-1 should use the Alternative Planning Criteria process described in 33 CFR § 155.1065 and 33 CFR § 155.5067.

Table 1-1: Acceptable Alternative Compliance and Regulatory Citations

Category	Response Plan Regulations	
	Facility	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

2. An approved alternative compliance is valid for a maximum of three years. Six months prior to expiring, the OSRO must notify the NSFCC either to reapply for the alternative compliance or to update their resources in RRI to reflect that the alternative compliance is no longer necessary. Once an OSRO has sent an alternative compliance request to the NSFCC either by mail or electronically, the NSFCC will solicit input from the applicable COTP, District, Area, and CG-MER prior to making an approval decision. Alternative compliance decisions will be made within 60 days of receiving all required documentation. After review and approval, the NSFCC will modify the RRI with the alternative compliance values. The RRI will use these new values in the classification calculations for the requesting OSRO.
3. **Effective Daily Recovery Capacity (EDRC):**
    a. 33 CFR § 154 Appendix C and 33 CFR § 155 Appendix B allow OSROs to submit an alternative compliance for EDRC on behalf of plan holders via the instructions in the regulations cited in Table 1-1 of these guidelines.
    b. OSROs submitting alternative compliance requests for EDRC must provide the appropriate documentation required in the regulations; including the specific tests utilized and the results for the specific class of equipment or verified performance data from real-world operations.
4. **Temporary Storage Capacity:**
    a. 33 CFR § 154 Appendix C and 33 CFR § 155 Appendix B allow OSROs to submit an alternative compliance for TSC on behalf of plan holders via the instructions in the regulations cited in Table 1-1 of these guidelines.
    b. OSROs submitting alternative compliance requests for TSC must provide the appropriate documentation required in the regulations; including the specific tests utilized and the results for the specific class of equipment or verified performance data from real-world operations.
5. **Vessel Speeds**: For classification purposes, the RRI assigns vessels a default speed of five knots (kts). The vessel speed of five kts is a planning criterion which is specified in 33 CFR § 154 and § 155 and accounts for mobilization time and environmental factors. However, if an OSRO can demonstrate that a specific vessel can consistently and safely perform at a speed greater than five kts, the OSRO may request their classification(s) be calculated using an alternative transit speed. Classification is more likely to be impacted when alternative speeds are applied to large vessels such as Oil Spill Response Vessels (OSRVs), tugboats, and barges. OSROs requesting to use an alternative speed for over-the-water transit shall submit their alternative compliance requests electronically or in writing to the NSFCC. The request should specify the specific vessel(s), the alternative speed that should apply to the vessel, and must, at a minimum, include the following documentation:
    a. Logs and records indicating the specific vessel's speed over various routes;
    b. Charts indicating routes and distance transited; and
    c. Mobilization plan of the specific vessel (including personnel recall numbers).
6. **Vehicle Speed**: For classification calculation purposes, the RRI assigns an over-the-road vehicle speed of 35 mph per 33 CFR § 154 and § 155. This speed accounts for average speed limits, potential traffic/congestion, and straight-line distance measurements. The 35 mph over-the-road transit speed is a fixed national planning criteria and is not eligible for alternative compliance consideration. Requests for alternative compliance for over-the-road transit speeds are not accepted or considered.

7. **Aircraft Speed:** For classification calculation purposes, the RRI uses an aircraft speed of 100 kts per the national planning criteria set forth in 33 CFR § 154 and § 155. If an OSRO can demonstrate that their owned and/or contracted aircraft can safely operate at speeds greater than 100 kts, they can request an alternative compliance for aircraft transit speed.

    a. OSROs that wish to use an alternative transit speed for air transit shall submit their requests electronically or in writing to the NSFCC. The requests should specify:

        (1) Logs and records of specific owned and/or contracted aircraft documenting the aircraft's speed over various routes;

        (2) Confirmation that they have reviewed and are abiding by all applicable Federal Aviation Administration (FAA), state and local regulations and policies; and

        (3) Charts indicating routes and distance transited.

    b. After review and approval, the NSFCC will modify the RRI with the new alternative compliance speed. The RRI will then use this new speed to calculate the classification. If the OSRO has already received a classification, the alternative compliance information will be used to revise the classification.

E. Alternate Classification Cities

1. Classifications are determined by calculating OSRO capability and response time measured from the equipment location to the COTP physical address identified in 33 CFR § 3.05-10 through 33 CFR § 3.85-15. Recognizing that commercial operations can often occur significant distances from the COTP office location yet still within the COTP zone, the Coast Guard developed Alternate Classification Cities (ACC). ACCs are Coast Guard designated locations used for OSRO capability and response time measurements for the purpose of calculating a classification based on the alternate location. ACCs help to alleviate the concern that, in larger COTP zones, a spill could occur at a greater distance from the COTP office to which an OSRO could not respond within the regulatory timeframes. The use of ACCs effectively breaks up large COTP zones into smaller geographic areas for the purpose of measuring response times and calculating an OSRO's classification. Note: Regulation requires the plan holder to calculate response times using the location the vessel operates farthest from the storage/staging location of the OSROs response equipment. This may not be the location of the COTP office or the ACC and may likely be an offshore location. It is imperative that plan holders ensure their contracted OSRO, regardless of classification, is able to meet their planning requirements. Plan holders must continue to conduct a plan-by-plan and vessel-by-vessel review of identified resources provided by their OSROs to validate that the resources available under the contract are sufficient to meet their planning requirements, even if an OSRO has a given classification for a specific operational area.

2. The following ACCs are geographic locations within the United States that have been designated to fill coverage gaps between COTP zones:

    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 Eastern Great Lakes
h. Oswego, NY; COTP Eastern Great Lakes
i. Marquette, MI; COTP Northern Great Lakes
j. Traverse City, MI; COTP Northern Great Lakes
k. Alpena, MI; COTP; Northern Great Lakes
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
r. American Samoa; COTP Honolulu
s. Adak, AK; COTP Western Alaska and U.S. Arctic
t. Kodiak, AK; COTP Western Alaska and U.S. Arctic
u. Prudhoe Bay, AK; COTP Western Alaska and U.S. Arctic
v. Nome, AK; COTP Western Alaska and U.S. Arctic
w. Unalaska, AK; COTP Western Alaska and U.S. Arctic
x. Ketchikan, AK; COTP Southeast Alaska
y. Sitka, AK; COTP Southeast Alaska
z. Yakutat, AK; COTP Western Alaska and U.S. Arctic
aa. Aberdeen, SD; Inland ACC
bb. Denver, CO; Inland ACC
cc. Gallup, NM; Inland ACC
dd. Lincoln, NE; Inland ACC
ee. Lubbock, TX; Inland ACC
ff. Miles City, MT; Inland ACC
gg. Missoula, MT; Inland ACC
hh. Oklahoma City, OK; Inland ACC
ii. Salt Lake City, UT; Inland ACC
jj. Saipan; COTP Guam
kk. Lewes – Lower Delaware Bay; COTP Delaware Bay
ll. Akutan; COTP Western Alaska and U.S. Arctic
mm. Sand Point; COTP Western Alaska and U.S. Arctic

nn. Atka-Nazan Bay; COTP Western Alaska and U.S. Arctic

oo. Shemya Island – Alcan Harbor; COTP Western Alaska and U.S. Arctic

pp. Buldir Pass; COTP Western Alaska and U.S. Arctic

qq. Amchitka Pass; COTP Western Alaska and U.S. Arctic

rr. Sanak Island; COTP Western Alaska and U.S. Arctic

ss. Attu Transit Zone; COTP Western Alaska and U.S. Arctic

tt. Amukta Pass; COTP Western Alaska and U.S. Arctic

uu. King Cove; COTP Western Alaska and U.S. Arctic

vv. Attu Island; COTP Western Alaska and U.S. Arctic

ww. St. Thomas; COTP San Juan

xx. St. Croix; COTP San Juan

3. OSROs that provide services for plan holders in areas where it may be appropriate to determine classification using an ACC should send all requests for ACC designations to the NSFCC. The NSFCC will consult with the applicable COTP and CG-MER when reviewing new ACC requests and establishing new ACCs.

F. OSRO Exercises

1. The FRP and VRP regulations require plan holders to conduct annual equipment deployment exercises involving the OSROs listed in their response plans pursuant to 33 CFR § 154.1055 and 33 CFR § 155.1060. An OSRO who is listed as the primary response organization in a response plan and wishes to obtain and maintain a classification shall participate in, record, and maintain documentation of these completed exercises.
2. OSROs that use a combination of owned and contracted resources to meet the requirements for classification, should include both categories of resources during exercises to demonstrate the working relationship and integration of separate system components provided by multiple OSROs and/or resource providers.
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. While implementing plan holder exercise requirements per 33 CFR § 154.1055 and/or 33 CFR § 155.1060, 40 CFR § 300.212, or while implementing National Preparedness for Response Exercise Program (NPREP) exercises, to the maximum extent practicable, OSROs are encouraged to work with plan holders, COTPs, and Area Committees to conduct equipment deployment exercises in conjunction with annual spill management team and area exercises. Additionally, OSROs are encouraged to use these exercises as an opportunity to validate response strategies contained in response and contingency plans.

G. Government Initiated Unannounced Exercises

1. The Government Initiated Unannounced Exercise (GIUE) program is designed to evaluate a plan holder's emergency response procedures in response to a simulated average most probable discharge. GIUEs are intended to test facility response plan and vessel response plan procedures for notifications, response time, and deployment of Marine Transportation-Related (MTR) facility-owned or OSRO

equipment. GIUEs also serve as an opportunity for the Coast Guard to ensure industry compliance with the required response plans and to evaluate the readiness of OSROs to deploy in fulfillment of contractual obligations.

2. Though the OSRO Classification Program no longer classifies OSROs based on AMPD requirements, an OSRO's performance during a GIUE may be an indicator of their MMPD or WCD capabilities and actions. An OSRO's performance or lack of participation during a GIUE may warrant a spot-check PAV by the NSFCC and may impact the OSRO's classification.

3. If the USCG Sector that initiates the GIUE deems the exercise unsatisfactory due to the actions of a classified OSRO (e.g., availability of equipment, inoperable/damaged equipment, incorrect or unsafe deployment or operation of equipment, or failure to participate), the Sector must inform the NSFCC and the DRAT. If the GIUE is unsatisfactory for reasons associated with classification criteria (inoperable equipment, poor maintenance, lack of training, safe work practices) the NSFCC may consider conducting a PAV spot-check to thoroughly review equipment inventory, condition, and operation, and conduct an audit of the OSRO's training, exercise, and maintenance programs as described in regulation and these guidelines. Additionally, if the OSRO has a Basic Ordering Agreement (BOA) with the Coast Guard, the Operational Logistics Command (LOG-92) will be notified to consider the status and conditions of the OSRO's BOA.

H. Personnel Training

1. The FRP and VRP regulations require plan holders to ensure response personnel are trained to perform their jobs in alignment with 33 CFR § 154.1050, § 155.1055, and § 155.5055. The OSRO classification program requires an OSRO to provide similar assurances. OSROs must conduct periodic training to reinforce required knowledge.

2. An OSRO should provide confirmation that it has identified the skills necessary to demonstrate in a response and document 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. A clear, streamlined communication program; and

   d. Training on specific response equipment identified in the OSRO application for all classification programs.

3. OSROs shall maintain training records for three years following completion of the training. All records must be available for review during the PAV. Training records may be requested in advance of a PAV visit.

I. 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, § 155.1062, and § 155.5062. This includes ancillary equipment, such as hoses, secondary pumps and trailers. OSROs should have a clear, preventative and corrective maintenance system in place. Furthermore, OSROs must document all inspections and

maintenance and maintain the records for three years. All maintenance records must be available for review during the PAV visit. Maintenance records may be requested in advance of a PAV visit.

J. 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 zone or ACC is based on the location of resources and certain environmental and geographic factors. During the application process, through the RRI, an OSRO will identify, per the guidance contained herein, the number of personnel required to mobilize and operate the resources at each of its resource sites.

2. Each site that meets the time requirements for a classification should have its personnel requirements totaled for that classification. If the OSRO has identified sufficient personnel that meet the response time requirements and concurrently deploys and operates all equipment necessary for that level of classification, then an OSRO qualifies for the resource requirement of that specific classification.

3. 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, extended 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. If an OSRO utilizes contracted resources for their classification from another resource provider, the resource owner should list all their equipment in the RRI prior to an OSRO listing a resource as contracted. In addition, an OSRO utilizing contracted resources for their classification must ensure those contracted resources are available for inspection during a PAV.

4. OSROs shall ensure the resource information in the RRI is accurate to maintain classification and service plan holders. A full and up-to-date inventory in the RRI will help COTPs and Area Committees know what response resources are available in their areas of responsibility.

K. Response Times

1. OSROs are required to meet certain response times as per 33 CFR § 154.1045, § 154.1047, § 155.1050, § 155.1052, § 155.5050 and § 155.5052. The regulations set the response times for classification. To receive a classification for a specific COTP zone or ACC, an OSRO must ensure its resources and trained personnel are able to meet the specified response times in that area.

2. Plan holders are required to use OSROs that are able to respond with resources from where they are stored to the incident location in accordance with the national planning criteria set forth in 33 CFR § 154 and § 155. The Coast Guard uses the national planning criteria in regulation to determine response times to the COTP city and ACCs when determining classification. A plan holder is then required to determine the response time to the facility location or vessel location farthest from the response equipment storage site when different from the COTP city or ACC location.

3. The RRI computes response times for the Mechanical and Dispersant classification programs 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.

4. Mobilization is the time it takes to get the resources assembled and prepared at the staging site. Mobilization begins once notifications are made to the resource provider. 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 1-2 below). Using this table, an OSRO determines mobilization time for each response resource included in its application and provides information on the status of each response resource during the application process.

   Note: Full-time personnel are considered a dedicated resource; part-time personnel are considered a non-dedicated resource. On-site indicates a 24-hour staffed resource site, as opposed to a resource site where personnel are required to be recalled. In addition, one half hour is added to response time to account for the time between the discovery of discharge and the notification to the OSRO.

Table 1-2: Resource Notification/Mobilization Response Times in Hours

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

5. Travel times for classification are computed using standard speeds set forth in the national planning criteria. The highway, air, or water distance is calculated in a direct line between the coordinates of the OSRO site and the coordinates of the COTP office address or the ACC. It is imperative an OSRO provides accurate coordinates of their equipment sites in the RRI. It is the responsibility of the plan holder, in coordination with the OSRO, to ensure the response resources can arrive within the timelines to facility or vessel per applicable regulations.
6. The RRI uses travel speeds of 35 mph for land, 5 kts for water, and 100 kts for aircraft for OSRO classification calculations. The RRI divides the distance by 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.

   Travel Time = (Distance between OSRO Site and COTP Zone or ACC) / Travel Speed
   Total Response Time = Notification Time + Mobilization Time + Travel Time

L. Status Changes in Equipment or Capabilities

1. OSROs shall report any significant changes made to its response resources to the NSFCC and COTP within 72 hours.
   a. The regulation defines “significant changes” 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 such as moving equipment from one site location to another or deleting equipment that is no longer functioning should be updated in the RRI within 72 hours.
2. Reductions in OSRO capabilities caused by surging equipment into another COTP zone during a

response may result in a loss of OSRO classification if it drops their capabilities below their classification threshold.

3. For changes in coverage due to planned maintenance that will exceed 48 hours, the OSRO should provide NSFCC, the appropriate COTP(s), and plan holders using their resources 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, proposes, or requests more information from the OSRO. The NSFCC, in consultation with the applicable COTP and 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. If mitigating measures are approved, the NSFCC will coordinate 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 the OSRO will lose its classification until it restores full coverage.
5. The RRI has a feature that notes when an OSRO site has been viewed or updated by a user from the OSRO. The RRI notifies the NSFCC when an OSRO site's inventory has not been updated or viewed in the last six months. If this occurs, the NSFCC will contact the OSRO and prompt them to verify the site's inventory. If the OSRO fails to update or verify their site information in the RRI, the NSFCC may delete the site from the RRI.

M. OSRO Guidelines Biennial Review

The NSFCC and CG-MER shall conduct a biennial review process of the *Guidelines for the U.S. Coast Guard Oil Spill Removal Organization Classification Program, and update if needed*.

CHAPTER 2. Preparedness Assessment and Verification (PAV) Visits

A. Introduction and Purpose

1. PAV visits are a critical component of the oil spill response preparedness system, providing on-site verification of OSRO response resources, condition and operability, OSRO training, maintenance and exercise programs, and validating resource data contained in the RRI database.
2. The NSFCC coordinates with DRAT, COTP, and other federal and state agencies on PAV visits to ensure thorough oversight and awareness of the OSROs (and their capabilities) within their area of responsibility.
3. The PAV program is used to verify OSRO resources listed in the RRI and the required elements for participating in the OSRO Classification Program. This includes verifying the OSRO resources listed in the RRI (type, kind, quantity, and capacity) are physically present at the OSRO site, ensuring OSRO resources are consistent with classifications, examining equipment systems, operationally testing equipment systems, reviewing maintenance programs, and reviewing training and exercise programs.
4. The Coast Guard may visit each location listed in the OSRO's application to account for and verify all listed resources, including both owned and contracted equipment and locations.
5. The guidance in this chapter provides OSROs with an overview of the PAV process and a basic framework of what to expect during a PAV visit.

B. Roles and Responsibilities

1. CG-MER serves as the program office for the OSRO classification program. CG-MER shall:
    a. Provide the NSFCC with requested VRP information to include, but not limited to, which OSROs serve as resource providers for vessel plan holders, which COTP zones the vessels operate in, and any other related information;
    b. Assist the NSFCC with coordinating or conducting PAV visits when requested by the NSFCC, and shall attend two PAV visits annually; and
    c. At the beginning of every fiscal year, facilitate a conference call between CG-MER, the NSFCC, and DRAT Supervisors to review NSFCC's PAV schedule.
2. The Commanding Officer of the NSFCC serves as the Administrator of the OSRO Classification Program, including all components of the PAV process. The NSFCC leads or coordinates all PAV visits. In addition, the NSFCC shall:
    a. Maintain a list of OSROs, their classification status (if applicable), and when they last received a PAV visit;
    b. Annually schedule PAV visits. Share PAV schedule information with DRATs and COTP personnel;
    c. Schedule and coordinate PAV spot checks when requested by DRAT or COTP;

d. Notify applicable DRATs and COTP personnel to assist with application process outlined in Figures 1-1, 1-2, and 1-3 of these guidelines;

e. Ensure DRATs and COTP personnel have access to RRI and other applicable PAV documentation in advance of a scheduled PAV visit;

f. Notify OSROs of a scheduled PAV, or PAV spot check, and designate one point of contact for OSROs to communicate questions beforehand;

g. Complete an After Action Report (AAR) for each COTP zone or ACC, and distribute to CG-MER, the applicable DRAT, and COTP; maintain an archive of past PAV AARs;

h. Share information with the COTP upon completion of a PAV visit and assist with the identification of OSRO equipment shortfalls or issues;

i. Lead or facilitate coordination of PAV spot checks within COTP zones or ACCs; and

j. Notify CG-MER of any reductions to classification based on new input and determinations from PAV activities.

3. The DRAT Supervisor, or their representative, serves as the District representative for PAV activities and shall work with the FOSC, COTP personnel, NSFCC representatives, and other federal, state, local, and tribal stakeholders to optimize District pollution response preparedness. DRAT Supervisors (or their representative) should:

   a. Maintain a comprehensive knowledge of OSRO inventories located throughout the District;

   b. Provide the District Commander and COTPs information on pollution response equipment capabilities, strategies, and operations;

   c. Assist the NSFCC with PAV visit coordination and when operationally available, assist with the PAV visit;

   d. Assist the NSFCC with the sharing of PAV AARs;

   e. Identify District response equipment shortfalls, including the identification of any challenges associated with cascading equipment into or within the District;

   f. Coordinate with the NSFCC to schedule a PAV spot check when the DRAT/COTP determines a PAV spot check is needed.

4. COTPs should provide, when operationally available, representatives to assist with a PAV visit. Also, COTPs should:

   a. Upon request from the NSFCC or DRAT, provide the NSFCC or DRAT with required FRP information to include, but not limited to, which OSROs serve as resource providers for facility plan holders, and any other related information;

   b. Notify the DRAT when a PAV spot check is desired;

   c. Provide feedback to the NSFCC and DRATs if OSRO discrepancies are observed during an actual response or exercise.

5. The NSFCC and CG-MER shall coordinate on all decisions that affect the OSRO classification program and the PAV process.

C. Types and Frequency of Preparedness Assessment and Verification Visits

1. The following is a list and broad overview of the types of PAVs, expected participants, and roles and responsibilities:

   a. **Routine PAV** – Participants: NSFCC (lead and coordinator), DRAT, servicing NSF Strike Team, and COTP personnel. A routine PAV visit verifies response equipment listed within RRI and the information submitted within the OSRO's application for classification at the time of the visit. The NSFCC will conduct the PAV visit using the process outlined in Sections D through G of this chapter within the scheduled COTP zone or ACC.

      (1) **Frequency** – An OSRO should expect one routine PAV visit every three years. Routine PAV visits are planned in advance and in coordination with the OSROs. PAV visits are generally scheduled and planned to target a specific geographic region or COTP zone, examining numerous OSRO equipment sites and balancing complex travel logistics, often times covering multiple states. Several factors are also considered when scheduling routine PAV visits including, higher volume port areas (HVPAs), National Preparedness for Response Exercise Program (PREP) exercise schedule, high-risk geographic locations, COTP zones, GIUE performance, ACCs, and specific requests from a District Commander or COTP.

      (2) **Other Government Agency (OGA) Equipment Verifications (EVs)** - The Bureau for Safety and Environmental Enforcement (BSEE) has their own equipment verification program focused on resources referenced in Outer Continental Shelf plans. To strengthen interagency collaboration while reducing a duplicative burden on the OSROs, the Coast Guard should coordinate with its interagency partners prior to conducting PAV visits. NSFCC shares PAV AARs with BSEE, the U.S. Environmental Protection Agency (EPA), and the Pipeline and Hazardous Materials Safety Administration (PHMSA).

   b. **PAV Spot Checks** – Participants: NSFCC (lead and coordinator), DRAT, servicing NSF Strike Team, and COTP personnel. PAV spot checks are conducted on OSROs that participate in the program. PAV spot checks are used to verify requirements outlined in Sections D through G of this chapter. However, a PAV spot check is more comprehensive and is utilized to verify corrective action when prior OSRO equipment system or documentation discrepancies were recorded during the routine PAV visit, exercise, or response, or at the request of the COTP. Spot checks are usually conducted with the objective of verifying corrected deficiencies or verifying compliance with the program after an unsuccessful GIUE, or other concerns raised by the COTP or DRAT. They are usually off cycle to a routine PAV, are more comprehensive in nature, and may occur announced or unannounced.

      (1) **Frequency** – PAV spot checks are conducted on an as needed basis. COTP or District should contact NSFCC to request a PAV spot check. PAV spot checks are determined based on risk, personnel availability, and feedback from COTPs.

D. Preparedness Assessment and Verification Visit Process

1. Once the NSFCC PAV team schedules the PAV visit for an owned and/or contracted OSRO site, the PAV team leader will print the OSRO's RRI data for that particular location. OSROs shall notify the PAV team leader or the NSFCC as soon as possible if unscheduled operations or other challenges may limit the scope or timing of the PAV visit. Participating in a PAV visit is a requirement for continued enrollment in the OSRO classification program. If an OSRO is unwilling to participate in a PAV visit, their participation in the OSRO classification program and all classifications will be terminated.

2. Prior to visiting an OSRO site, the PAV team will review the classification(s) the OSRO holds, and the associated guidance contained within these guidelines. At the minimum, the PAV team should complete the following during the PAV visit:

   a. Complete a visual survey of all resources listed in the RRI; verify that the equipment the OSRO has listed in the RRI matches what is physically on site; and operate at least 10% of listed equipment systems to ensure satisfactory operating condition and function to include (when applicable):

      (1) Boom;

      (2) Vessels;

      (3) Skimmers;

      (4) Vacuum systems;

      (5) Product transfer pumps;

      (6) Temporary storage;

      (7) Dispersants;

      (8) Dispersant delivery systems;

      (9) Aerial oil tracking aircraft (manned or unmanned);

      (10) Non-floating oil resources (detection, recovery);

      (11) Shoreline cleanup resources; and

      (12) Miscellaneous OSRO equipment (e.g., salvage and marine firefighting equipment, hazardous material response equipment, oil-water separators).

   b. Ensure response resources are properly maintained. Verify that a preventative and corrective maintenance system is in place. Verify maintenance-related documentation.

   c. Verify the OSRO personnel listed as available and trained to mobilize, deploy, and operate the equipment.

   d. Verify compliance with all Hazardous Waste Operations and Emergency Response (HAZWOPER) requirements listed in 29 CFR § 1910.120 and ensure documentation accurately reflects all listed personnel who have satisfactorily completed HAZWOPER training (initial and refresher).

e. Verify operability and logistic support capability for the response inventory. Where applicable, review the site's logistic narrative and determine the status of the support services listed in the narrative (e.g., equipment rentals, commercial drivers, personnel services) plus their ability to mobilize and sustain the resources.

f. Verify exercise participation records, including AARs or lessons learned, to ensure the OSRO continues to improve operations and is addressing any identified areas of concern.

3. While the aforementioned process is the primary framework, it is not all-inclusive. The PAV team leader may determine whether a more in-depth examination is required to verify a specific component in the OSRO's operation.

E. Personnel Training

1. The PAV team verifies that response personnel at the resource site are trained in accordance with HAZWOPER regulations (29 CFR § 1910.120) and other job-specific requirements (e.g., commercial driver's license (CDL), diver certifications, or merchant mariner credential) by conducting a review of personnel training records located at the OSRO site.

2. Prior to the PAV team'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. The OSRO should provide these records to the NSFCC when requested. Training records may be requested in advance of a PAV visit.

F. Examination of Equipment Systems and Maintenance Records

1. The PAV team conducts a review of the OSRO's resources listed in the RRI as required by the appropriate classification program and level. When completing the visual equipment survey, the PAV team will examine equipment systems from each classification category. All systems that count toward classification should be in working order and able to be deployed into the marine environment. While PAV visits are not considered an operational equipment deployment exercise, the verification of the equipment's ability to function properly is key. During the PAV visit, if an OSRO cannot account for the equipment's proper operation (recent spill or exercise), they may be required to operate one or more systems for the PAV team. The PAV team leader is encouraged to operate equipment as "systems" rather than as individual components of a system (e.g. testing compatible pumps and skimmers).

2. In addition to a physical examination of equipment systems, the PAV team will conduct a review of all applicable equipment maintenance records as required by 33 CFR § 154.1057, 33 CFR § 155.1062, and 33 CFR § 155.5062. 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, the OSRO should have equipment maintenance records readily available. Maintenance records may be requested in advance of a PAV.

G. Preparedness Assessment and Verification Visit Equipment Criteria

1. The PAV team considers the following criteria (not all inclusive), as applicable, when conducting the PAV visit:

(1) Boom:

(a) Overall condition;

(b) Evidence of ownership, lease, or subcontract;

(c) Manufacturer, type, and quantity; and

(d) Condition of shoreline cleanup boom.

(2) Recovery Devices (Skimmers and Vacuum Trucks):

(a) Evidence of ownership, lease, or subcontract;

(b) Manufacturer, type, model, and throughput capacity;

(c) Operability and maintenance;

(d) Condition of the prime mover and other supporting/ancillary equipment; and

(e) Holding capacity.

(3) Oil Spill Response Vessels (Skimmers, Barges, and Support Craft):

(a) Evidence of ownership, lease, or subcontract;

(b) Operability and maintenance;

(c) Storage capacity, shelf life, and/or expiration date;

(d) Inspection/certification; and

(e) Length, beam, draft, and transit speed.

(4) Temporary Storage Devices:

(a) Evidence of ownership, lease, or subcontract;

(b) Manufacturer, type and model (as applicable);

(c) Capacity (twice the daily capacity of recovery devices);

(d) Inspected and maintained in accordance with manufacturer's recommendations;

(e) Contracted barges with current certificates; and

(f) Location of fixed storage.

(5) Boats:

(a) Types and number of boats;

(b) Operability and maintenance;

(c) Length, beam, draft; and

(d) Certification/registration.

(6) Dispersants:

(a) Manufacturer, type, and quantity;

(b) Volumes of dispersant(s) to support WCD tiers;

(c) Stowage;

(d) Identification of dispersant product resource provider;

(e) Primary staging site location;

(f) Distance between product's home base and primary staging site;

(g) Amount of each stockpile required to support required effective daily application capacity (EDAC) of each dispersant application platform;

(h) Capability of commencing dispersant application operations at site of discharge within seven hours of decision by FOSC; and

(i) EDAC determination using Estimated Dispersant System Potential (EDSP) calculator.

(7) Application Platforms:

(a) Type;

(b) Identification of resource provider;

(c) Distance between platform's home base and identified primary dispersant staging site; and

(d) Dispersant payload for each dispersant application platform.

(8) Aerial Oil Tracking and Application Capabilities:

(a) Identification of resource provider;

(b) Type and location of aerial surveillance aircraft available, through contract or other approved means;

(c) At least 50% of each EDAC tier requirement must be achieved through the use of fixed-wing aircraft-based application platforms;

(d) 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 (NM) from shore (excluding inland areas);

(e) Capability of supporting oil spill removal operations continuously for three 10-hour operational periods during the initial 72 hours of the discharge; and

(f) Numbers of aircraft, pilots, and trained observation personnel.

(9) Non-floating Oil Response Resources:

(a) Evidence of ownership, lease, or subcontract;

(b) Identification of resource provider;

(c) Industry and professional certifications;

(d) Condition of detection and recovery equipment;

(e) Information management and software systems related to the detection and recovery equipment;

(f) Manufacturer, type, and model (as applicable);

(g) Operability and maintenance;

(h) Length, beam, draft, range, transit speed, and crew size;

(i) Capacity;

(j) Transportability;

(k) Primary staging site location;

(l) Inspected and maintained in accordance with manufacturer's recommendations;

(m) Contracted barges with current certificates;

(n) Planned operating area(s); and

(o) Location of temporary/fixed storage.

(10) Groups II-IV (within inland, near shore, or offshore where preauthorization exists):

(a) Capability of commencing dispersant application operations at site of discharge within seven hours of decision by FOSC; and

(b) Capability to meet Tier 1, 2, and 3 response times for completed applications listed in Table 33 CFR § 155.1050(k).

(11) Records and Labeling:

(a) Equipment must be clearly marked for identification;

(b) Records must be available that support claims of ownership, lease, or subcontract;

(c) Complete maintenance records reflecting condition of equipment;

(d) Dispersant plans on site and updated (if applicable);

(e) Past three years of personnel training records must be made available; and

(f) Past three years of exercise records must be made available.

(12) Logistics Narrative: An OSRO shall 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 zone or ACC requested. Narratives might contain, but are not limited to:

(a) Methods of personnel recall (if applicable);

(b) Methods of loading resources for mobilization;

(c) Methods of resource transport off-site to incident or staging;

(d) Methods of mobilizing, deploying, and supporting resources;

(e) Special response resources staging (e.g., prepackaging, palletizing, preloading); and

(f) Necessary site support services (e.g., tractors, trailers, drivers, cranes).

H. Preparedness Assessment and Verification Visit Results

1. During the PAV visit, the PAV team verifies that the resource information the OSRO has entered into the RRI matches what is actually observed at the OSRO's equipment site and documents any discrepancies. Discrepancies may also be identified with an OSRO's training, maintenance, or exercise documentation or the operability of equipment. If discrepancies are identified, the PAV team will document the findings and instruct the OSRO to make the appropriate corrections and update the RRI accordingly. The OSRO will be given sufficient opportunity (normally 7 calendar days) to correct the deficiencies (many inventory discrepancies can be corrected on the spot by logging into the RRI and updating inventory information). This process will not affect classification as long as the deficiency does not significantly reduce the OSRO's overall response readiness. If an OSRO fails to make the appropriate inventory updates in the RRI, the NSFCC may delete the inventory record from the RRI.
2. The NSFCC will inform the OSRO's representative of the timeline to correct the deficiencies. The OSRO must provide the NSFCC with appropriate documentation of the corrections. However, if the severity of the deficiencies indicate that the OSRO is not capable of meeting their classification requirements, the Coast Guard may immediately reduce or revoke the OSRO's classification until the deficiencies are corrected. OSROs that are unable to resolve the discrepancies needed to reinstate their classification per the NSFCC's established instruction and timeline will be required to be reevaluated through the full OSRO classification application process.
3. Once the OSRO has submitted proof of corrective action, the NSFCC in coordination with the COTP/DRAT, may conduct a PAV spot check to verify corrected deficiencies. If a PAV spot check is necessary, it will be conducted within 60 days to ensure compliance. If the OSRO fails the PAV spot check, classification may be removed.
4. For minor discrepancies, an in-person spot check may not be required. Some discrepancies may be able to be addressed via proper documentation and transmittal from the OSRO to the NSFCC (e.g. photo/video-documentation). It is imperative that an OSRO makes timely corrections and updates to the RRI to ensure their classification and compliance with the OSRO Classification Program is maintained.
5. If an OSRO disagrees with the results of a PAV visit, the OSRO may submit an appeal in writing to the Commanding Officer of the NSFCC within 30 days of the PAV visit. If the OSRO remains unsatisfied with the determination after the appeal, the OSRO may submit a second appeal to CG-MER.
6. An After Action Report (AAR) is completed by the NSFCC for each routine PAV visit or spot-check. The AARs are documented in the RRI. In addition, PAV AARs are shared with Coast Guard and interagency stakeholders.

I. Other Reasons for Downgrading an OSRO's Classification

1. Other reasons for downgrading a classification can include, but are not limited to:

    a. The PAV team could not verify resources listed by the OSRO in the RRI and/or could not match the resources to the classification level requirements.

    b. Response resources are unable to meet response times or do not function properly during drills, exercises, responses, and PAV visits.

    c. The OSRO fails to meet the training, maintenance, and exercise provisions of these guidelines.

    d. The OSRO is unwilling to make themselves available for a PAV visit or declines to participate in the PAV process.

CHAPTER 3. Mechanical Classification Requirements for OSROs

A. Overview

1. The Coast Guard classifies OSROs based on the location of their response resources and an assessment of their ability to mobilize those resources to a fixed location; the COTP office location or ACC location. Equipment standards and response times specific to each operating area within a COTP zone are used to classify OSROs per national planning criteria set forth in the VRP and FRP regulations. 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 requirements specific to the OSRO Classification Program for Mechanical OSROs.

B. Resource Requirements

1. The classification takes into consideration the following core resources: protective boom, EDRC containment boom, 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 a plan holder to have a specific amount, size, and type of boom available for shoreline protection purposes for MMPDs and WCDs per 33 CFR § 155, Appendix B, Table 1. For classification purposes, it is assumed the OSRO serves both vessel and facility plan holders/clients. Since the protective boom requirements for VRPs 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 plan holders, the OSRO can submit, in writing to the NSFCC, a request to base its protective boom requirements on the amount specified in the Area Contingency Plan (ACP) and FRP for the relevant COTP zone in accordance with 33 CFR § 154 Appendix C, paragraph 5.6.

D. Oil Recovery Device Operating Environment

1. Per 33 CFR § 155 Appendix B, Table 1, oil recovery devices must be at least capable of operating in wave heights up to and including the values listed in Table 1 of the regulation.

2. OSROs must ensure the skimmers they enter in the RRI are capable of operating within the environments for which they are seeking classifications, based on the manufacturer's specifications.

E. EDRC and Containment Boom

1. EDRC, containment boom, and response vessels are considered as a system. For classification purposes, the Coast Guard counts EDRC credit toward an OSRO's classification only if there is, at a minimum, 300 feet of containment boom available to be deployed to complete each skimming system in the applicable operating area.

2. Per 33 CFR § 154.1045, an OSRO must have 1,000 feet of containment boom or two times the length of the largest vessel that regularly conducts petroleum oil transfers to or from the

facility, whichever is greater. For classification purposes, 1,000 feet of containment boom is used for the calculation in addition to the 300 feet per skimming system required to complete the skimming system. In addition, OSROs must identify response vessels to support the skimming systems that also meet the specific FRP and VRP time requirements outlined in regulation and these guidelines.

F. Temporary Storage Capacity

1. TSC and EDRC are interconnected. 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. The regulation limits an OSRO's classification 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 (EDRC is equal to one half of the available TSC).
2. When entering temporary storage in the RRI, an OSRO must enter vessels that have TSC (tank barges, tank vessels, OSRVs, etc) as vessels. An OSRO must not enter vessels that have TSC as portable storage in the RRI, as this would result in the resource being assigned the incorrect speed. For small tank barges (i.e. 249bbl mini barge) that are transported primarily over the road, they can be entered into the RRI as portable storage. However, an OSRO must not list the same resource as both a vessel and as portable storage, as this would result in double counting the same resource and an inflation of their actual TSC.
3. Non-dedicated TSC, for the purposes of this classification program, includes any TSC supplied by a non-dedicated tank barge and non-dedicated mobile storage (i.e. vacuum trucks and FRAC tanks). 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 required TSC 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 that response equipment must mobilize within two hours for a MMPD and WCD1 classification. However, as an exception, the Coast Guard's OSRO Classification Program allows non-dedicated tank barges and mobile storage (e.g. vacuum trucks and frac tanks) to qualify for the MMPD and WCD1 mobilization if the non-dedicated TSC is provided at a 2:1 ratio, and the non-dedicated TSC is always capable of arriving at the COTP or ACC location within the time required for MMPD and Tier 1 classification. For example, if an OSRO required 25,000 bbls of TSC for WCD1 classification, the OSRO would be required to have 50,000 bbls of TSC if using a non-dedicated tank barge or non-dedicated mobile storage to meet their TSC requirement.
4. When entering non-dedicated tank barges in the RRI, an OSRO must identify the specific barge they are utilizing by contract or other approved means and identify the vessel's location. Though this vessel may be transitory, the location should represent the vessel's homeport or where the vessel is located the majority of the time, as this location is used for time/distance calculations. OSROs are not permitted to use barge fleets nor list the same resource at multiple locations. Furthermore, an OSRO should list the support vessel(s) in the RRI they plan to use to tow the non-dedicated tank barge to the spill site.

5. OSROs can 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 valid for non-dedicated tank barges and mobile storage and is not valid for fixed storage. In addition, mobile storage is limited to 45% of the total TSC.
6. OSROs can identify fixed storage tanks ashore to meet the TSC requirements in limited circumstances. The NSFCC will accept them only for OSRO classifications covering the rivers/canals, Great Lakes, and inland operating areas. Fixed storage is limited to 35% of the total TSC, provided an OSRO certifies that it can transport recovered oil to the fixed tanks ashore and sustain the required EDRC. The Coast Guard does not allow shore-side fixed storage tanks in the near shore, offshore, or open ocean operating areas.
7. 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 skimming system.

G. Response Vessels

1. Response vessels are integral to every response. OSROs should clearly identify the specific vessels intended for response services in the RRI. The NSFCC reviews available response vessels and they must be made available for verification during a PAV visit. If a shortfall is perceived, further discussion with the OSRO is warranted before a classification is considered.
2. The Coast Guard will only consider response vessels that meet the response time requirements by tier as outlined in these guidelines. All response vessels identified must be appropriate for the operating environment and meet applicable Coast Guard regulations and policy guidelines (e.g. navigation lights, safety equipment, life vests).

H. Response Aircraft

1. Response aircraft, whether manned or unmanned, are essential for tracking oil spills and assessing the impact of the spill. Aircraft intended for response services should be clearly identified in the RRI. Plan holders must identify in their response plan and ensure the availability through contract or other approved means, those response resources necessary to provide aerial oil tracking to support oil spill assessment and cleanup activities as per 33 CFR § 155.1050(l) and 33 CFR § 155.5050(k). Facilities operating exclusively on inland rivers are not required to comply with this paragraph.
2. OSROs should ensure response aircraft are capable of supporting oil spill removal operations continuously for three 10-hour operational periods during the initial 72 hours of the discharge.
3. OSROs should include appropriately located aircraft and personnel capable of meeting the response time requirement for oil tracking, and a sufficient number of aircraft, pilots, and trained observation personnel to support oil spill removal operations, commencing upon initial

assessment, and capable of coordinating on-scene cleanup operations, specifically mechanical recovery operations in this case.

4. OSROs must train observation personnel in the protocols of oil spill reporting and assessment, including estimation of slick size, thickness, and quantity. These trained personnel must understand the use of assessment techniques in American Society for Testing and Materials (ASTM) Standard F1779, and be familiar with the use of other guides, such as the National Oceanic and Atmospheric Administration's (NOAA) *Open Water Oil Identification Job Aid for Aerial Observation* and *Characteristic Coastal Habitats* guides.
5. All response aircraft identified must meet applicable Coast Guard and FAA regulations and policy guidelines. Response aircraft are subject for verification during a PAV visit.
6. If an OSRO uses aircraft to transport response resources, the resource must be "associated" to a specific aircraft in the RRI. The aircraft must have appropriate capability and must be made available for verification during a PAV visit.

I. MMPD and WCD Tier 1 Classification

Only resources located at equipment sites capable of being mobilized and enroute 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. The only exception to this is non-dedicated tank barges and non-dedicated mobile storage previously described in 3.F.2.

J. WCD Tier 2 and WCD Tier 3 Classifications

Owned, contracted, dedicated, and non-dedicated equipment may be used for WCD2 and WCD3 classification.

K. Planning Volumes

1. FRP and VRP regulations specify the quantity of resources required for specific planning volumes. The regulations categorize requirements as the MMPD and WCD (see below for planning volumes), and further divide WCD into Tiers 1, 2, and 3.
7. FRP and VRP regulations establish MMPD and WCD from a calculation using a facility's largest foreseeable oil discharge or a vessel's cargo volume, as shown in Table 3-1 below. For classification purposes, 2,500 bbls is used for the MMPD planning volume.

Table 3-1: Planning Volumes for Discharge Categories

Category	Facility	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	A discharge in adverse weather conditions of a vessel's entire fuel or oil cargo, whichever is greater

**Defined in 33 CFR § 154.1020, § 155.1020, and § 155.5020*

8. 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 chapter on Specific Classification Standards by Operating Area (Chapter 4) 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 Tables 3-2, 3-3, and 3-4 on the following page for more details.

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

Area	Configuration	MMPD	WCD1	WCD2	WCD3
Persistent Oils (Groups II – IV)					
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	-	-	-	-
Non-Persistent Oils (Group I)					
Rivers/Canals	Protective	-	15,000	15,000	15,000
Great Lakes	Protective	-	10,000	10,000	10,000
Inland	Protective	-	10,000	10,000	10,000
Near shore	Protective	-	10,000	10,000	10,000
Offshore	Protective	-	-	-	-
Open Ocean	Protective	-	-	-	-

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	1,200	12,500	25,000	50,000

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

L. 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 vessels. A summary of response times is listed in Table 3-5.

2. If a COTP zone contains an HVPA, then response times for the Mechanical OSRO classification are more stringent. HVPA requirements are listed in 33 CFR § 154.1045, 33 CFR § 155.1050, and 33 CFR § 155.5050 and include any area within 50 NM seaward of the entrance to the higher volume port.

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

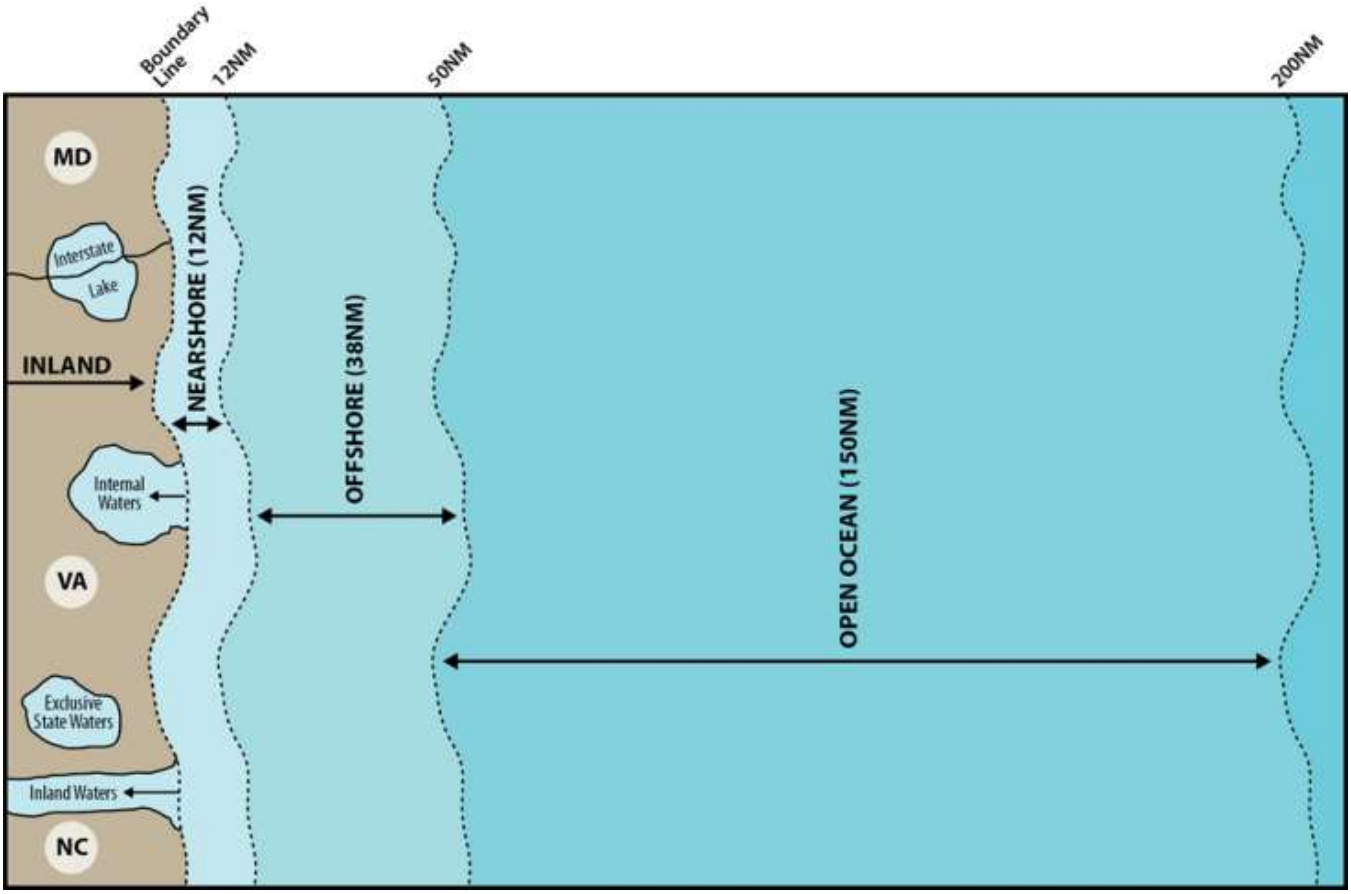
Area	Facility or Vessel	MMPD	WCD1	WCD2	WCD3
Rivers/Canals	Facility	12	12	36	60
	Vessel	24	24	48	72
	Facility HVPAs	6	6	30	54
	Vessel HVPAs	12	12	36	60
Great Lakes	Facility	6	12	36	60
	Vessel	12	18	42	66
	Facility HVPAs	N/A	N/A	N/A	N/A
	Vessel HVPAs	N/A	N/A	N/A	N/A
Inland	Facility	12	12	36	60
	Vessel	24	24	48	72
	Facility HVPAs	6	6	30	54
	Vessel HVPAs	12	12	36	60
Near shore	Facility	12	12	36	60
	Vessel	24	24	48	72
	Facility HVPAs	6	6	30	54
	Vessel HVPAs	12	12	36	60
Offshore	Facility	12	12	36	60
	Vessel	24	24	48	72
	Facility HVPAs	6	6	30	54
	Vessel HVPAs	12	12	36	60
Open Ocean	Facility	12	12	36	60
	Tank Vessel	24	24+	48+	72+
	Nontank Vessel	24	24	N/A	N/A

CHAPTER 4. Mechanical Classification Standards by Operating Area

A. Operating Areas

1. The operating areas for the Mechanical classification standard include inland, rivers/canals, great lakes, nearshore, offshore, and open ocean, as defined by 33 CFR § 154.2001 and 33 CFR § 155.1020 (see definitions in Appendix B of this document) and depicted in Figure 4-1 below.

Figure 4-1: Operating Areas



B. Adverse Weather Considerations

1. All equipment identified in a response plan must be capable of operating in the conditions expected within the geographic area in which a vessel operates. These conditions vary widely based on the location and season.

2. Vessels storing, handling, or transporting oil in more than one operating environment must identify equipment capable of successfully functioning in each operating environment. For example, vessels moving from the ocean to a river port must identify appropriate equipment designed to meet the criteria for transiting oceans, inland waterways, rivers, and canals. This equipment may be designed to operate in all these environments or, more likely, different equipment may be designed for use in each area.

3. When identifying equipment, a vessel owner or operator must consider the inherent limitations in the operability of equipment components and response systems. The criteria in Table 1 of Appendix B to 33 CFR § 155 must be used for evaluating the operability in each operating environment. These criteria reflect the general conditions in certain operating areas.
4. Table 1 of Appendix B to 33 CFR § 155 lists criteria for oil recovery devices and boom. All other equipment necessary to sustain or support response operations in a geographic area must be designed to function in the same conditions. For example, boats that deploy boom or support skimmers must be capable of being safely operated in the significant wave heights listed for the applicable operating environment. The Coast Guard may require documentation that the boom identified in a response plan meets the criteria in Table 1 of Appendix B to 33 CFR § 155. Absent acceptable documentation, the Coast Guard may require that the boom be tested to demonstrate it meets the criteria in Table 1 of Appendix B to 33 CFR § 155. Testing must be in accordance with certain ASTM standards.
5. A vessel owner or operator must refer to the applicable ACP to determine if ice, debris, and weather-related visibility are significant factors in evaluating the operability of equipment. The ACP will also identify the average temperature ranges expected in a geographic area in which a vessel operates. All equipment identified in a response plan must be designed to operate within those conditions or ranges.

C. Shallow Water Requirements

1. Depending on the operating area, a certain percentage of OSRO resources must be capable of operating in waters of six feet or less as required by 33 CFR § 154.1045 and § 155.1050 (see Table 4-1 below). An OSRO must identify equipment in its application to meet this requirement.

Table 4-1: Percentage of Response Equipment Capable of Operating in Shallow Waters

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

D. Rivers and Canals

1. The following table summarizes 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 4-2: 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)	Vessel Response Times (hours)
MMPD (1,200 bbls/day recovery					
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
WCD1 (1,875 bbls/day recover)					
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
WCD2 (3,750 bbls/day recovery)					
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
WCD3 (7,500 bbls/day recovery)					
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 (pounds (lbs)) = 4,500;

(4) Skirt fabric tensile strength (lbs) = 200; and

(5) Skirt fabric tear strength (lbs) = 100.

E. Great Lakes

1. The following table summarizes 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 used in this operating area must be capable of operating in 4-foot wave heights.

Table 4-3: 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)	Vessel Response Times (hours)
MMPD (1,200 bbls/day recovery					
6,000	1,000 plus 300 per skimming system	1,200	2,400	6	12
WCD1 (6,250 bbls/day recover)					
30,000	1,000 plus 300 per skimming system	6,250	12,500	12	18
WCD2 (12,500 bbls/day recovery)					
30,000	1,000 plus 300 per skimming system	12,500	25,000	36	42
WCD3 (25,000 bbls/day recovery)					
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; and

(5) Skirt fabric tear strength (lbs) = 100.

F. Inland

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

Table 4-4: 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)	Vessel Response Times (hours)
MMPD (1,200 bbls/day recovery					
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
WCD1 (12,500 bbls/day recover)					
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
WCD2 (25,000 bbls/day recovery)					
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
WCD3 (50,000 bbls/day recovery)					
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

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; and

(5) Skirt fabric tear strength (lbs) = 100.

G. Near Shore

The following table summarizes 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 used in this operating area must be capable of operating in 6-foot wave heights.

Table 4-5: 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)	Vessel Response Times (hours)
MMPD (1,200 bbls/day recovery					
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
WCD1 (12,500 bbls/day recover)					
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
WCD2 (25,000 bbls/day recovery)					
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
WCD3 (50,000 bbls/day recovery)					
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

Boom properties must include the following:

(1) Boom height (draft plus freeboard) (inches) = ≥ 42 containment; ≥ 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; and

(5) Skirt fabric tear strength (lbs) = 125 containment; > 100 shoreline protection.

H. Offshore

The following table summarizes the minimum equipment standards and maximum response times for classifying OSROs for the planned response to spills in the offshore operating area. With the exception of shoreline protection boom, all equipment 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 Offshore Operating Area

Protective Boom (feet)	Containment Boom (feet)	Oil Recovery Equipment (bbls/day EDRC)	Recovered Oil Storage (bbls TSC)	Facility Response Times (hours)	Vessel Response Times (hours)
MMPD (1,200 bbls/day recovery					
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
WCD1 (12,500 bbls/day recover)					
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
WCD2 (25,000 bbls/day recovery)					
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
WCD3 (50,000 bbls/day recovery)					
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

Boom properties must include the following:

(1) Boom height (draft plus freeboard) (inches) = ≥ 42 containment; ≥ 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; and

(5) Skirt fabric tear strength (lbs) = 125 containment; > 100 shoreline protection.

I. Open Ocean

The following table summarizes 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 4-7: 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)	Vessel Response Times (hours)
MMPD (1,200 bbls/day recovery					
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
WCD1 (12,500 bbls/day recover)					
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
WCD2 (25,000 bbls/day recovery)					
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
WCD3 (50,000 bbls/day recovery)					
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

Boom properties must include the following:

(1) Boom height (draft plus freeboard) (inches) = ≥ 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; and

(5) Skirt fabric tear strength (lbs) = 125.

CHAPTER 5. OSRO Classification Dispersant Program

A. Introduction

1. NSFCC evaluates OSROs seeking classification for dispersants on their ability to safely apply set volumes of surface dispersant within set periods to the furthest 50 NM offshore areas within each COTP zone or ACC. This chapter provides guidance to OSROs concerning planning standards, core resource expectations, and how to meet the regulatory criteria of dispersant operations.
2. NSFCC considers core resources into four categories: dispersant product; Effective Daily Application Capacity (EDAC); dispersant application platform; and aerial oil tracking and application capabilities. NSFCC calculates dispersant classifications through the RRI and EDSP program.
3. NSFCC evaluates OSRO dispersant classification levels, assesses the OSRO's dispersant plan, and estimates the EDAC for its dispersant application systems. The regulations (33 CFR § 155.1050, 33 CFR § 155.5050, and 33 CFR § 154.1045) only sanction the EDSP. The EDSP is available at https://www.bsee.gov/sites/bsee.gov/files/dispersants-cal.html. OSROs should contact the NSFCC prior to submitting their dispersant plan.

B. Response Plan Requirements

1. VRP and FRP regulations—specifically 33 CFR § 155.1050, 33 CFR § 155.5050, and 33 CFR § 154.1045—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), 33 CFR § 155.1050(k), or 33 CFR § 155.5050(j), whichever is the lesser amount. The dispersant identified must be of a type listed on the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) Product Schedule (400 CFR § 300.915). 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 OSRO and spill management team for the first seven days of the response.
2. If the Coast Guard has evaluated and classified an OSRO, then a plan holder may reference the classified OSRO in their response plan instead of listing all the required dispersant resources. OSROs should maintain awareness of areas with pre-authorization for dispersant use and plan holder requirements.

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

1. The Coast Guard categorizes dispersant classifications by WCD Tiers 1, 2, and 3 and labels them WCD1, WCD2, and WCD3, respectively. 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 its Tier 1, 2, and 3 requirements.

2. WCD1: To qualify for the WCD1 classification, an OSRO must be able to commence dispersant operations within seven hours and must be able to apply 8,250 gallons (gulf coast region)/4,125 gallons (all other U.S regions), within 12 hours of the FOSC's decision to use dispersants, as per 33 CFR § 155.1050(k) (1), 33 CFR § 155.5050(k) (1), and 33 CFR § 154.1045(i) (1). For planning and classification purposes, the Coast Guard assumes 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. Dispersant-dedicated aerial oil tracking resources must be capable of being on-scene (50 NM offshore) within seven hours.
3. WDC2: To qualify for the WCD2 classification, an OSRO must be able to apply 23,375 gallons of dispersants 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 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 Table 5-1 in Section D of this chapter.
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. Effective Daily Application Capacity

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. EDAC is evaluated by 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 EDSP, 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 Table 5-1 below and can be found in 33 CFR § 154.1045(i), 33 CFR § 155.1050(k), and 33 CFR § 155.5050(j).

Table 5-1: Tiers for 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. EDAC counted towards Tier 1 will be de-rated through the EDSP by completing the cascade information within the EDSP calculator. 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 to EDAC calculations. For dispersant-applying aircraft, OSROs shall use the time specified in their contract with the aircraft to determine mobilization time. The OSRO must provide a letter of attestation to the NSFCC stating the times that the contracted aircraft can mobilize. Actual contracts must be available for review by the NSFCC during PAV visits. For vessels, OSROs shall apply the times listed in Table 5-2 in Section N of this chapter.
5. Aircraft which transit from their home location without dispersant application equipped and which must make a stop within the area of operations to fit equipment, refuel, or load dispersant payload must account for this time period during the EDAC calculation. If an aircraft deploys directly from its mobilization point and can dispense dispersants upon arrival on-scene, this additional equipment delay is not imputed.
6. If there are additional dispersant quantities that exceed a Tier's EDAC requirement, credit for the excess dispersant quantities will go towards meeting the next Tier's 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.

E. Location and Documentation of Dispersant Resources

1. 33 CFR § 155.1035, 33 CFR § 155.5035, and 33 CFR § 154.1035 require that plans provide dispersant application platforms, stockpiles, and staging site locations. OSROs must enter these resources and their locations into the RRI. Furthermore, OSROs must maintain documentation that captures manufacturer-specific data, the type of dispersants at each stockpile and/or staging site location, and their shelf life and/or expiration date.

F. Captain of the Port Zones

The Coast Guard COTP zones are defined in 33 CFR § 3.05-10 through 33 CFR § 3.85-15.

G. 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. The regulations specify the use of actual land and air routes 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. The EDSP designates aircraft speed used for calculating EDAC. If an OSRO adds a new aircraft to the EDSP, then an alternative 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.

H. Dispersant Application Platform

Dispersant application platforms must be capable of delivering and applying dispersant on a discharge. At least 50% of each EDAC tier requirement must be achieved by fixed-wing aircraft application platforms.

I. American Society for Testing and Materials Standards

1. All dispersant application personnel must be trained in and capable of applying dispersants as outlined in ASTM F1413: “Standard Guide for Oil Spill Dispersant Application Equipment: Boom and Nozzle Systems” as per (i)(2)(iii).

2. Boom and nozzle dispersant application systems must be capable of applying dispersants in accordance with ASTM F1413.

   a. Minimum Equipment Performance Specifications, as per ASTM F1413 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; and

      (3) Maximum Delivery Variation over Swath Width: The equipment shall be capable of delivering dispersant with a maximum delivery variance of 10% over the swath width. Swath width is the length between the points at which the delivery drops below 90% of the design.

3. Document the adequacy of dispersant application systems not fully covered by ASTM F1413 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. NSFCC evaluates equipment for compliance with ASTM standards during the PAV visits. 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 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; and

(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. OSROs must ensure routine maintenance is performed on all dispersant equipment. They should conduct calibration of oil spill dispersant application equipment per ASTM F1460 and testing of oil spill dispersant application equipment in accordance with ASTM F1738.

J. Aerial Oil Tracking and Application Capabilities for Dispersant Use

1. Per the VRP and FRP regulations—33 CFR § 155.1035, 33 CFR § 155.5035, 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. Aircraft and personnel must be appropriately staged to meet the response time, number of aircraft pilots, and trained observation personnel requirements for supporting oil spill operations. This should commence upon initial assessment and aircraft and personnel must be capable of coordinating on-scene cleanup operations for dispersant operations. Observation personnel must be trained in the protocols of oil spill reporting and assessment and be familiar with the use of pertinent guides including, but not limited to, NOAA's *Open Water Oil Identification Job Aid for Aerial Observation* and the *Characteristic Coastal Habitats* guide.

2. As a planning standard for classification, aerial observation aircraft used for tracking the oil spill must be able to arrive at the site of the discharge (up to 50 NM offshore) within seven hours for Tier 1 WCD, 24 hours for Tier 2 WCD, and 48 hours for Tier 3 WCD.

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 Table 5-2 under paragraph (M)(3) of this chapter.

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.

K. Personnel

1. The number of personnel needed to support a response depends on numerous factors. OSROs seeking Dispersant classification shall ensure 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. PAV teams will review personnel training records and rosters to ensure compliance.

L. Response Times and Dispersant Stockpiles

1. In addition to dispersant resource quantities, OSROs are required to meet certain response times (33 CFR § 154.1045, 33 CFR § 155.5050, and 33 CFR § 155.1050). 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 WCD Tier 1, 36 hours to complete dispersant application for WCD Tier 2, and 60 hours to complete dispersant application for WCD 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's selected primary staging location for an incident using the applicable transit speeds and routes. For WCD Tier 1, all required dispersants must arrive within seven hours of the FOSC's decision to use dispersants. For WCD 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 WCD 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 oil tracking aircraft and are listed in Table 5-2 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.

M. Estimated Dispersant System Potential Calculations

1. The NSFCC requires that an OSRO records and maintains its EDSP calculations, as documentation, for each dispersant application resource for Tiers 1, 2, and 3 WCDs, and for each staging area within the COTP zone or ACC for which they are applying for classification.
2. OSROs should understand the requirements below to help facilitate the EDSP calculation process:
    a. The NSFCC requires an OSRO to provide a screenshot of their EDSP 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. Screenshots should display the mobilization time. If electronic means are not available, then a hand-written mobilization time on the screenshot will suffice.
    b. Screenshots should be sent via email to the NSFCC at nsfcc-pav@uscg.mil.

CHAPTER 6. OSRO Classification Guidelines for Non-Floating Oils

A. Overview

1. Heavy oils and Group V oils, hereby merged and defined as non-floating oils, exhibit qualities that could potentially cause the oils to submerge or sink, due to the oil characteristics, weathering, environmental factors, or how they are discharged. Examples of these types of oils include, but are not limited to, Diluted Bitumen (Dilbit), Group V Residual Fuel Oils, LAPIO (Low API Oil), Asphalt, and Asphalt Products. Regulations categorize certain heavy oils within a different persistent oil grouping than Group V oils; however, due to the technical fact that environmental and geographic conditions can subject heavy oils to submerge and sink, applicable plan holders and OSROs must be aware of and strongly consider the risk.
2. To capture the detection and response capabilities of OSROs more efficiently and enhance the response to non-floating oils, the Coast Guard created the Non-Floating Oil classification. Previously, OSROs submitted Group V oil plans to the Coast Guard and, if deemed sufficient, would be listed as a Group V OSRO. The Group V OSRO classification is no longer valid. All OSROs seeking the Non-Floating Oil Classification must reapply through procedures outlined in this chapter.
3. OSROs that are already classified in the mechanical classification program for a plan holder that handles, stores, or transports oils that are not Group V oils but that fall under the heavy oil definition, should notify the NSFCC of their intention to classify as a Non-Floating Oil OSRO. An OSRO's current mechanical classification will not be impacted. A Non-Floating Oil classification does not equate or supersede any other classification nor relieve the OSRO of any contractual responsibilities to their respective plan holders.
4. While this specific classification is focused on non-floating oil spill response, the Coast Guard strongly emphasizes that oils with a higher specific gravity than 1.0 can still remain positively buoyant when discharged into the environment, given certain environmental conditions. While the Coast Guard does not require a certain type of mechanical classification as a prerequisite to earn the Non-Floating Oil classification, the Non-Floating Oil classification has no bearing on the responsibility that each OSRO has to the plan holder for responding to what could become a positively buoyant or surface-oriented oil spill.
5. The underwater environment, poor visibility, and irregular behavior of non-floating oils present significant response challenges to the oil spill response community in comparison to surface-oriented oil spills. Standard measures such as EDRC, and response techniques such as containment, have been proven to be inadequate and are difficult to apply for an oil spill where most of the oil is submerged below the surface or has sunk to the bottom, termed non-floating oil. Therefore, to accommodate different ranges of technology and facilitate flexibility for each OSRO, the Coast Guard has created a detailed application for the Non-Floating Oil classification.
6. To earn a Non-Floating Oil classification, OSROs shall submit an application to the NSFCC requesting classification, along with non-floating oil plan procedures. The NSFCC will ensure all proper documentation is included and will disseminate the plan to CG-MER. With assistance from subject matter expert reports (e.g. *the American Petroleum Institute's (API) Technical Report on Sunken Oil Detection and Recovery*), the NSFCC and CG-MER will then qualitatively

assess whether the OSRO has met the minimum level of safety and capability for the Non-Floating Oil classification. OSROs must demonstrate the capability to respond to all areas and conditions where non-floating oil response operations may take place within the operating area and operating zone and must demonstrate a level of equipment to work in a variety of water depths and conditions.

7. Upon delivery of the OSRO's Non-Floating Oil classification application to the NSFCC, the determination of the OSRO's Non-Floating Oil classification will occur no later than 60 days. This chapter provides further guidance to OSROs on how to apply for and attain the Non-Floating Oil classification and expectations of what information should be included in the non-floating oil procedures.
8. The Non-Floating Oil classification meets the regulatory requirements of Group V oils in accordance with the criteria set forth by 33 CFR § 154.1047, 33 CFR § 155.1052, 33 CFR § 155.5052, and the OSRO classification guidelines.
    a. Plan holders who handle, store, or transport oils that are not Group V oils, but that fall under the non-floating oil definition, are highly recommended to resource Non-Floating Oil OSROs in addition to OSROs already classified in the mechanical classification program. Plan holders that handle, store, or transport oils that are Group V oils shall utilize Non-Floating Oil classified OSROs. The Coast Guard's classification program no longer recognizes the Group V OSRO listing, which was removed from the RRI.
9. OSROs should be aware of the types of oil that their plan holder's vessel or facility handles, stores, or transports, as each type of oil presents unique response challenges. Overall, this document and chapter emphasize the vital role that the COTP and the NSFCC/CG-MER maintain in oversight and examination of an OSRO's non-floating oil response capabilities, planning, and execution. Guidance is provided to assist with the following field responsibilities:
    a. Conducting a review of the Non-Floating Oil classification application and procedures;
    b. Using GIUEs to evaluate Non-Floating Oil OSRO response capabilities;
    c. Employing existing field activities to validate overall non-floating oil response capabilities.

B. Non-Floating Oils Classification Evaluation

1. The Coast Guard will evaluate equipment that is owned or contracted and used to respond to non-floating oil spills based on its suitability and ability to respond to non-floating oils.
2. Government and industry plan holders are responsible for screening OSROs to ensure they meet the planning standards for specific operating locations. Specifically, government and industry plan holders should compare the environments and depths in which they operate with the Non-Floating Oil OSRO capabilities (and what depth they extend to).
    a. **Non-Floating Oil PAV visits**: Upon concurrence of an OSRO's Non-Floating Oil classification application, the NSFCC will coordinate a PAV visit to verify certain or all capabilities. With respect towards mitigating excessive costs for the OSRO, the assessment may include testing certain equipment, training verification, and an audit of the OSRO's documentation

with contractors. PAV visits will be conducted in accordance with NSFCC, cognizant COTP's frequency posture, and CG-MER policy.

3. The following are fundamental expectations for the NSFCC and CG-MER evaluation of an OSRO's non-floating oil procedure:
   a. Do they possess appropriate detection capabilities such as sonar, sampling equipment, or other methods for locating the petroleum oil on the bottom or suspended in the water column? The equipment must be sufficient to address a range of depths and bottom types.
   b. Do they possess appropriate recovery capabilities such as dredges, pumps, or other equipment necessary to recover petroleum oil from the bottom and shoreline?
   c. Do they possess appropriate equipment and processes necessary to assess the environmental impact of non-floating oil discharges? Examples include detection equipment listed in Section (B)(1)(a) and Section (C) of this chapter and trained response personnel.
   d. Do they possess other appropriate equipment necessary to respond to a discharge involving the type of petroleum oil handled, stored, or transported?
   e. Is the equipment suitable for intended geographic area of operations (e.g. restricted visibility, inland rivers, ice conditions in Alaska)?
   f. Are there any records of the OSROs past performance that should be taken into consideration?

C. Application for Non-Floating Oils Classification

1. To earn a Non-Floating Oil classification, OSROs shall send their application electronically (preferred) or by mail to the NSFCC using procedures listed in Chapter 1 (A) of these guidelines.
2. The application shall include the following information:
   a. OSRO Name;
   b. Address;
   c. Points of Contact;
   d. Basic Ordering Agreement Number (if applicable);
   e. The COTP zones or ACCs you intend to operate (if known);
   f. The estimated deployment time for the detection and recovery assets for each location Note: In COTP zones or ACCs, resources must deploy within 24 hours for vessel response plans; for facility response plans, resources must be on site within 24 hours;
   g. The maximum depth or range of the OSRO's detection and recovery assets (list the lesser of the two, if different);
   h. Inventory list (specify whether resources are dedicated or non-dedicated);
   i. Any contracts associated with non-floating response assets;
   j. Maximum capacity of fixed/temporary storage;

k. Location of fixed/temporary storage;

l. Training documentation, logs, records and/or professional certificates for all non-floating oil spill response personnel (includes contracted response personnel such as divers);

m. General Logistics Narrative. The Coast Guard does not expect a logistics narrative for every COTP zone or ACC, but rather a universal logistics narrative. A logistics narrative should include, but not be 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); and

(6) Necessary site support services (e.g., tractors, trailers, drivers, cranes);

n. Non-floating oil procedures (reference Section D of this chapter).

3. A Non-Floating Oil classification application shall be submitted to the NSFCC prior to any entries into RRI. Doing so ensures that the NSFCC and CG-MER have time to review the application and confirm that the OSRO has met the minimum requirements to satisfy the regulations and challenges faced during a non-floating oil discharge. After a successful submission and upon notification from the NSFCC, OSROs shall input their resources into the appropriate non-floating oil categories in the RRI and ensure that the resource information is accurate to maintain classification and to service plan holders.

D. Non-Floating Oil Procedures and Core Equipment Standards

1. While each segment within the Non-Floating Oil classification application will increase the level of preparedness for the Coast Guard, OSROs, and plan holders, the non-floating oil procedures are the heart of the application. 33 CFR § 154.1047(a)(1), 33 CFR § 155.1052(a)(1), and 33 CFR § 155.5052 state that plan holders must identify procedures and strategies for responding to a WCD of Group V petroleum oils to the maximum extent practicable.

2. In effect, the non-floating oil procedures are an opportunity for the OSRO to present its concept of operations to the Coast Guard for non-floating oil spills. Given the range of densities and properties of non-floating oils, and the environments in which they are handled, stored, or transported, it is understood that response operations will be unique to the type of event; therefore, a prescriptive model is not expected within the plan. However, to establish a baseline model, the Coast Guard has established core resources and considerations, in alignment with the intent of 33 CFR § 154.1047 and 33 CFR § 155.1052, for the OSRO to connect its inventory, personnel, and contractual assets and elaborate on their capability to respond to non-floating oil spills.

3. The regulations separate core resources and considerations into four categories: (I) Detection Capabilities, (II) Recovery Capabilities, (III) Storage Capabilities, and (IV) Environmental Conditions and Operating Areas. A fifth optional category, (V) Containment, can be added to

the non-floating oil procedures if, whether through best practices or new technology, the OSRO deems it a necessary aspect of their operations. OSROs are encouraged to have all of their non-floating oil-related equipment listed within this section under each core resource. At the minimum, each OSRO should include the following within their non-floating procedures.

a. **Detection Capabilities**: The timing of a non-floating oil survey is essential to success in detecting non-floating oil, because once the oil remobilizes, detection becomes more difficult with passing time. OSROs shall identify equipment and methods used for locating the product on the bottom or suspended in the water column and identify equipment necessary to assess the impact of such discharges. OSROs should include the depth to which these capabilities extend and what limitations may exist. OSROs should state how these capabilities complement their procedures and strategies for responding to a WCD of non-floating oils to the maximum extent practicable. OSROs shall ensure that all strategies and capabilities follow industry standards and comply with local, state, and federal laws (e.g. contracted diver OSROs will comply with OSHA and Coast Guard regulations).

   (1) Examples of Detection Capabilities.

      (a) **Sonar systems**. Examples of capabilities include the side scan sonar, multi-beam echo sounder, sub bottom profiler, and 3D scanning sonar.

      (b) **Underwater visualization systems including cameras and video**. Examples of capabilities include cameras with resolutions of >15 megapixels, sediment profile imaging (SPI) cameras, and acoustic cameras.

      (c) **Diver observations**. OSROs should be familiar with *API Technical Report 1154-1: Sunken Oil Detection and Recovery*. Specifically, section 6.0, titled “Diving in Contaminated Water,” should be referenced to protect the safety and health of the divers assigned to complete this work. OSROs shall specifically state the diving capabilities such as surface-supplied, mixed gas, saturation systems, one-atmosphere suits, or submersibles.

      (d) **Towed or stationary sorbents**. Examples of capabilities include sorbents attached to chains that are dragged on the bottom and sorbents suspended in the water column or placed in cages.

      (e) **Laser fluorosensors**. The unit is towed close to the bottom.

      (f) **Visual observations by trained observers**. Trained observers can be rapidly deployed and record vital data about non-floating oil, as long as the oil is visible to the observer. Preferred capabilities are water surface and aerial observations.

      (g) **Bottom sampling**. Examples of capabilities include sediment grab, core samplers, wading-depth shovel pits, and agitation methods.

      (h) **Water sampling in-situ analysis**. Examples include fluorometers and mass spectrometers that are towed in the water column.

b. **Recovery Capabilities**: OSROs shall identify equipment and methods used to recover the product from the bottom and shoreline. OSROs should include the depth to which these

capabilities extend and what limitations may exist. OSROs should state how these capabilities complement their procedures and strategies for responding to a WCD of non-floating oils to the maximum extent practicable. OSROs shall ensure that all strategies and capabilities follow industry standards and comply with local, state, and federal laws (e.g. contracted diver OSROs will comply with OSHA and Coast Guard regulations).

(1) Examples of Recovery Capabilities.

(a) **Suction Dredge**. Dredging through use of hydraulic pumps to remove and transport the oil, oiled sediments, and oiled debris.

(b) **Diver-directed pumping and vacuuming**. Pumping capabilities refer to the use of a centrifugal or positive-displacement type pump at or below the water surface with a diver-directed suction hose. Vacuuming refers to a vacuum truck or unit above the water surface, either on shore or on a vessel/barge that creates a vacuum, with divers directing the hose attached to the vacuum. OSROs should be familiar with API *Technical Report 1154-1: Sunken Oil Detection and Recovery*. Specifically, section 6.0, titled "Diving in Contaminated Water," should be referenced to protect the safety and health of the divers assigned to complete this work.

(c) **Mechanical removal**. Examples of capabilities include excavators, clamshell dredges, environmental dredge buckets, or other machinery used to grab, scoop, or pick up sunken oil, oiled sediments, and oiled debris.

(d) **Sorbent/V-SORs**. Sorbents attached to chains that are dragged on the bottom to recover liquid oil.

(e) **Trawls and nets**. These are towed in the water column or on the bottom to recover viscous oil.

(f) **Manual removal**. Physical removal of viscous oil using hand tools, either by wading in shallow water or by divers in deeper water.

(g) **Agitation/refloat**. Agitation of oil on the bottom to get the oil to float to the surface for recovery.

c. **Storage Capabilities**: While fixed and temporary storage capabilities are not prescriptively listed in 33 CFR § 154.1047, 33 CFR § 155.1052, or 33 CFR § 155.5052, the regulations do require plan holders to identify appropriate equipment necessary to respond to a discharge. Storage resources are essential aspects of a response and fall within the intent of 33 CFR § 154.1047(c)(5) and 33 CFR § 155.1052(c)(4). Therefore, OSROs shall identify storage resources and methods used to store the recovered product. OSROs should state how these capabilities complement their procedures and strategies for responding to a WCD of non-floating oils to the maximum extent practicable. OSROs shall ensure all strategies and capabilities follow industry standards and comply with local, state, and federal laws.

d. **Environmental Conditions and Operating Areas**: In accordance with 33 CFR § 154.1047(b) and 33 CFR § 155.1052(b), OSROs shall include a general description of the operating area (water depth included) to which their capabilities can extend and the environmental conditions in which their capabilities can operate without limitation. As OSROs may operate

within multiple COTP zones or ACCs, only a general description is expected. OSROs should include any additional equipment that is critical to their non-floating oil spill response during certain environmental conditions, such as specialized heating apparatuses during colder weather. OSROs should include methods used to mitigate the additional risks that each operating area and its environment, including seasonal conditions, may pose.

(1) Examples of Environmental Conditions and Operating Areas:

(a) Ice conditions;

(b) Debris;

(c) Temperature ranges;

(d) Weather and seasonal conditions; and

(e) Water salinity and visibility.

e. **Containment (Optional)**: OSROs may identify equipment and methods used for containing the product that may remain floating on the surface or to reduce spreading on the bottom. OSROs should include the depth to which these capabilities extend and what limitations may exist. OSROs should state how these capabilities complement their procedures and strategies for responding to a WCD of non-floating oils to the maximum extent practicable. OSROs shall ensure all strategies and capabilities follow industry standards and comply with local, state, and federal laws (e.g. contracted diver OSROs will comply with OSHA and Coast Guard regulations).

(1) Examples of Containment Capabilities:

(a) Nets or curtains attached to the bottom and/or suspended from the surface;

(b) Physical barriers such as artificial depressions (e.g. trenching);

(c) Bottom boom;

(d) Sheet piling;

(e) Bubble curtain; and

(f) Sorbents in filter fences or cages.

E. Resource Requirements

1. To be classified as a non-floating oil-capable OSRO, the OSRO must be able to demonstrate the minimum requirements listed in Section D of this chapter.

2. 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 zone or ACC is based on the location of resources. During the application process, through the NSFCC and/or RRI, an OSRO will identify the number of personnel required to mobilize and operate the resources at each of its resource sites for a non-floating oil discharge. Each site that meets the time requirements for a classification should have its personnel requirements totaled for that classification. If the OSRO has identified sufficient personnel to

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.

3. Resources counted for OSRO classification can be owned or contracted. All contracted assets must have a letter of agreement (LOA) between the OSRO and the contracting company on file at the NSFCC. 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 shall be listed in the RRI by the resource owner prior to an OSRO listing a resource as contracted.

APPENDIX A. List of Acronyms

AAR	After Action Report
ACC	Alternate Classification City
ACP	Area Contingency Plan
AMPD	Average Most Probable Discharge
AOR	Area of Responsibility
APC	Alternative Planning Criteria
API	American Petroleum Institute
ASTM	American Society for Testing and Materials
bbl	Barrel; unit of volume
BSEE	Bureau of Safety and Environmental Enforcement
CDL	Commercial Driver's License
CFR	Code of Federal Regulations
CG-CVC	Coast Guard Office of Commercial Vessel Compliance
CG-MER	Coast Guard Office of Marine Environmental Response Policy
COTP	Captain of the Port
DOR	Dispersant-to-Oil Ratio
DRAT	District Response Advisory Team
Dilbit	Diluted Bitumen
EDAC	Effective Daily Application Capacity
EDRC	Effective Daily Recovery Capacity
EDSP	Estimated Dispersant System Potential Calculator
EEZ	Exclusive Economic Zone
EPA	Environmental Protection Agency

ERSP	Estimated Recovery System Potential
EV	Equipment Verification
FAA	Federal Aviation Administration
FI	Facility Inspector
FOSC	Federal On-Scene Coordinator
FRP	Facility Response Plan
FWPCA	Federal Water Pollution Control Act
GIUE	Government-Initiated Unannounced Exercise
HAZWOPER	Hazardous Waste Operations and Emergency Response
HVPA	Higher Volume Port Area
IMD	Incident Management Division
kts	Knots; unit of speed
LAPIO	Low API Oil
LOA	Letter of Agreement
lbs	Pounds
MMPD	Maximum Most Probable Discharge
mph	Miles Per Hour; unit of speed
MSU	Marine Safety Unit
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPC	National Planning Criteria
NM	Nautical Miles
NOAA	National Oceanic and Atmospheric Administration
NSF	National Strike Force
NSFCC	National Strike Force Coordination Center

OGA	Other Government Agency
OPA 90	Oil Pollution Act of 1990
OSHA	Occupational Safety and Health Administration
OSRO	Oil Spill Removal Organization
OSRV	Oil Spill Response Vessel
PAV	Preparedness Assessment and Verification
PHMSA	Pipeline and Hazardous Materials Safety Administration
PREP	Preparedness for Response Exercise Program
RCP	Regional Contingency Plan
RRI	Response Resource Inventory
RRT	Regional Response Team
SPI	Sediment Profile Imaging
TSC	Temporary Storage Capacity
VMD	Volume Median Diameter
VRP	Vessel Response Plan
WCD	Worst Case Discharge

APPENDIX B. Glossary Terms

Adverse Weather	The weather conditions that will be considered when identifying response systems and equipment in a response plan for the applicable operating environment. Factors to consider include, but are not limited to, significant wave height, ice, temperature, weather-related visibility, and currents within the COTP zone in which the systems or equipment are intended to function.
Alternate Classification City (ACC)	A designated geographic location along the U.S. coastline used in addition to or in lieu of a COTP zone for an OSRO classification.
Area Contingency Plan (ACP)	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 WCD 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.
Alternative Planning Criteria	Planning criteria approved by the Coast Guard when a planholder believes that national planning criteria in 33 CFR § 154, 155 are inappropriate to the vessel for the areas in which it is intended to operate.
Captain of the Port (COTP) Zone	A zone specified in 33 CFR § 3 and, for coastal ports, the seaward extension of that zone to the outer boundary of the exclusive economic zone (EEZ).
Classification	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.
Containment Boom	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.
Contract	(1) A written contractual agreement between a vessel owner or operator and an oil spill removal organization. The agreement must identify and ensure the availability of specified personnel and equipment required under this subpart within stipulated response times in the specified geographic areas; (2) Certification by the vessel owner or operator that specified personnel and equipment required under this subpart are owned, operated, or under the direct control of the vessel owner or operator, and are available within stipulated response times in the specified geographic areas; (3) Active membership in a local or regional oil spill removal organization that has identified specified personnel and equipment required under this subpart that are available to respond to a discharge within stipulated response times in the specified geographic areas.

Dedicated Response Resources	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.
Dispersant Application Platform	Vessels and aircraft outfitted with dispersant-application equipment acting as the delivery system for the dispersant onto the oil spill.
Dispersant	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. Dispersants that may be authorized for use are listed on the NCP Product Schedule, maintained by EPA.
Effective Daily Application Capacity (EDAC)	The estimated amount of dispersant that can be applied to a discharge by an application system given the availability of supporting dispersant stockpiles.
Estimated Dispersant System Potential Calculator (EDSP)	The Estimated Dispersant System Potential Calculator is a tool for OSROs seeking Dispersant classification. Regulations delineate the Planner requirements. The Planner uses dispersant-related input from the OSROs to evaluate and identify sufficient and appropriately trained personnel, vessels, delivery systems, dispersants, and any other input parameters specified in the calculator. These values help the NSFCC with determining the Dispersant classification level of the OSRO.
Great Lakes	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.
Gulf Coast Region	The region encompassing the following COTP zones: Corpus Christi, TX; Houston/Galveston, TX; Port Arthur, TX; Morgan City, LA; New Orleans, LA; Mobile, AL; and St. Petersburg, FL.
Heavy Oils	Includes all liquid petroleum products, whether refined, unrefined, diluted, or weathered, which, at any point of its fate, possess an API gravity equal to or less than 20˚. This definition includes Dense Nonaqueous Phase Liquids (DNAPL), Diluted Bitumen (Dilbit), LAPIO (Low API Oil), Asphalt, and Asphalt Products.
Higher Volume Port Areas (HVPA)	Ports listed in 33 CFR § 154.1020 and 33 CFR § 155.1020, including any water area within 50 NM seaward of the port.
Inland Area	The area shoreward of the boundary lines defined in 46 CFR part 7, except that in the Gulf of America, it means the area shoreward of the lines of demarcation (COLREG lines) as defined in 33 CFR §§ 80.740 through 80.850. The inland area does not include the Great Lakes.

Maximum Most Probably 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.
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.
National Planning CAPs	CAPs as referenced in 33 CFR 155 § Appendix B recognize the practical and technical limits of response capabilities for which an individual vessel owner or operator can contract in advance. The owner or operator of a vessel carrying groups I through IV petroleum oil as a primary cargo, whose required daily recovery capacity exceeds the applicable contracting caps in 33 CFR 155 § Appendix B, Table 6, shall identify commercial sources of additional equipment equal to twice the cap listed for each tier or the amount necessary to reach the calculated planning volume, whichever is lower, to the extent that this equipment is available.
National Planning Criteria (NPC)	The National Planning Criteria as written in the Clean Water Act refers to all planning requirements applicable to Facility and Vessel Response Plans listed in the Code of Federal Regulations. The National Planning Criteria for applicable marine transportation-related facilities is found in 33 CFR § 154 and for vessels the criteria is found in 33 CFR § 155.
Near Shore	The area extending seaward 12 NM from the boundary lines (except in the Gulf of America) defined in 46 CFR § 7. In the Gulf of America, it means the area extending seaward 12 NM from the line of demarcation (COLREG lines) as defined in Sections 80.740–80.850 of 33 CFR § Chapter I.
Non-dedicated Response Resources	Response resources with service that is not limited exclusively to oil or hazardous substance spill response-related activities.
Non-Floating Oils	All **heavy oils** and **Group V oils** that have the propensity to move below the sea surface either because of their initial densities or because the changes in their densities as a result of weathering or interaction with sediments. Non-floating oils may be below the water surface, suspended in the water column, or deposited on the seabed.
Non-Floating Oil Plan	A comprehensive plan, owned by the OSRO, which outlines the characteristics of the OSRO's resources and capabilities for non-floating oil spills in relation to the classification's core standards.
Non-persistent or Group I Oil	A petroleum-based oil that, at the time of shipment, consists of hydrocarbon fractions, 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).

Ocean	The near shore, offshore, and open ocean operating areas as defined in these guidelines.
Offshore	The operating area up to 38 NM seaward of the outer boundary of the near shore area.
Oil Spill Removal Organization (OSRO)	An entity that provides oil spill response resources.
Open Ocean	The area from 38 nautical miles seaward of the outer boundary of the nearshore area, to the seaward boundary of the exclusive economic zone (EEZ).
Operating Area	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.
Operating Environment	Rivers/canals, Great Lakes, inland, or ocean. These terms are used to define the conditions in which response equipment is designed to function.
Other Approved Means	For the purposes of these guidelines, means a Letter of Intent as defined in this Glossary.
Owned Resources	Equipment that belongs solely to the OSRO or personnel directly employed by the OSRO submitting an application for classification.
Preparedness Assessment and Verification (PAV) Visit	PAVs are a critical component of the oil spill response preparedness system, providing on-site verification of resources and their condition.
Persistent Oil	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: **Group II**: Specific gravity less than 0.85 **Group III:** Specific gravity between 0.85 and less than 0.95 **Group IV**: Specific gravity equal to or greater than 0.95 and less than 1.0 **Group V:** Specific gravity equal to or greater than 1.0
Pre-authorization	An agreement, adopted by an RRT or Area Committee, which authorizes the use of dispersants at the discretion of the FOSC without the further approval of other federal or state authorities. Pre-authorization areas are generally limited to particular geographic areas within each region.
Primary Staging Site	A site designated within a COTP 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.

Protective Boom	Boom used for deflecting/diverting or otherwise influencing oil on the water surface away from sensitive environments, often but not always toward containment sites.
Resource Site	A location where personnel and pollution response equipment are staged.
Response Resource Inventory (RRI)	The database of oil spill response resources developed by the Coast Guard to meet requirements of OPA 90.
Response Resources	The personnel, equipment, supplies, and other capabilities necessary to perform the response activities identified in an FRP or VRP.
Rivers/Canals	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.
Skimming Systems	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.
Temporary Storage Capacity (TSC)	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.
Tiers 1, 2 and 3 Worst Case Discharge Classifications	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.
Worst Case Discharge (WCD)	As defined by 33 U.S.C. § 1321, 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."