OSROs: WHERE ARE THEY FOR THE FACILITY RESPONSE PLAN HOLDERS IN THE WESTERN USA?

AN INDUSTRY PERSPECTIVE

By

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THE NEED FOR INLAND OSRO’S

WESTERN U. S. HAS:

14.6% OF U. S. REFINERIES

NUMEROUS CRUDE OIL PIPELINES

NINE OF THE TOP TWENTY OIL PRODUCING STATES

VULNERABLE AREAS

NO U. S. COAST GUARD COTPs OR ACCs
U. S. COAST GUARD COTP AND ACC COVERAGE
REFINERY LOCATIONS IN THE U. S.
CRUDE OIL PIPELINE LOCATIONS IN THE U. S.
OIL AND NATURAL GAS PRODUCING STATES

TOP 5
NEXT 5
NEXT 10
ALL OTHERS
VULNERABILITIES

PIPELINE CROSSINGS

INLAND REFINERIES

TERRORIST THREATS

NUMBER OF INLAND SPILLS

70% OF ALL SPILLS OCCUR INLAND

NATIONAL TREASURES

GRAND CANYON

YELLOWSTONE NAT’L PARK

MESA VERDE

LAKE POWELL
ISSUES FACED BY WESTERN COMPANIES THAT NEED OSROs

LOCATED OUTSIDE COTP/ACC CIRCLES

OSRO RESPONSE TIMEFRAMES

EPA and DOT CHECKLISTS REQUIRE AN OSRO

MUTUAL AID ORGANIZATIONS PROVIDE LIMITED HELP AND RELIABILITY
ISSUES FACED BY AN INLAND OSRO

LOCATION OF COTPs and ACCs MAKE SUPPORTING INLAND SITES DIFFICULT

LIMITED UNDERSTANDING OF EQUIPMENT DIFFERENCES IN COASTAL AND INLAND ENVIRONMENTS BY REGULATORY AGENCIES

DIFFERENT APPROACHES TO INLAND WATER SPILLS VS. COASTAL SPILLS ARE REQUIRE A CHANGE IN PERSPECTIVE
POSSIBLE ALTERNATIVE CITIES

UTILIZE CITIES WHERE THE EPA OR DOT ALREADY HAS A PRESENCE TO CREATE NEW CLASSIFICATION CITIES CONTROLLED BY EPA/DOT CALLED INLAND COMPLIANCE CITIES
POSSIBLE ALTERNATIVE INLAND COMPLIANCE CITIES

- Great Falls, MT
- Billings, MT
- Casper, WY
- Phoenix, AZ
- Bismarck, ND
- Salt Lake City, UT
- Denver, CO
- Amarillo, TX
- Albuquerque, NM
- Wichita, KS
INLAND RIVER BOOMING LOCATIONS

ARIZONA
Colorado
Gila
Aqua Fria
Salt
Bill Williams

COLORADO
Arkansas
Colorado
Fountain
South Platt
Alamosa

NEW MEXICO
Rio Grande
Red
Chama
Brazos
San Juan

Rio Grande
Snake
Pine
Gunnison
Animas

Embudo
Pecos
Cimarron
Canadian
Mora
Gila
## INLAND RIVER BOOMING LOCATIONS (cont.)

- **NORTH DAKOTA**
  - Missouri Red
  - Popo Agie Green Wind
  - North Platt Shoshone Gross Ventre Powder

- **WYOMING**
  - Little Wind Yellowstone Big Horn Tongue Lamar
  - Cheyenne Clarks Fork Hovack Sand

- **IDAHO**
  - Big Lost Big Wood Little Lost
  - Little Wood Lochsa Payette
  - Clark Fork Clearwater Salmon Selway
  - Colburn Humboldt Snake
EQUIPMENT DIFFERENCES

INLAND ENVIRONMENTS NEED:

SMALLER BOOM

INLAND

COASTAL
EQUIPMENT DIFFERENCES

INLAND ENVIRONMENTS NEED:

SMALLER SKIMMERS

INLAND

COASTAL
APPROACHES TO INLAND WATER SPILLS
BANK TO BANK CASCADE ANCHOR SYSTEM
APPROACHES TO INLAND WATER SPILLS
BRIDGE TO BANK CASCADE ANCHOR SYSTEM
APPROACHES TO INLAND WATER SPILLS
BRIDGE TO BANK CASCADE ANCHOR SYSTEM
APPROACHES TO INLAND WATER SPILLS
BUOY TO BANK CASCADE ANCHOR SYSTEM
APPROACHES TO INLAND WATER SPILLS
BUOY TO BANK CASCADE ANCHOR SYSTEM
OBSERVATIONS

MANY CURRENT OSROs ARE TOO FAR AWAY TO REACH MANY INLAND COMPANIES IN A TIMELY MANNER

US COAST GUARD RESPONSIBILITIES DO NOT EXTEND TO MOST INLAND AREAS

EPA AND DOT INVOLVEMENT IS CURRENTLY LIMITED TO FACILITY RESPONSE PLAN REVIEWS
RECOMMENDATIONS

EPA AND DOT ESTABLISH “INLAND COMPLIANCE CITIES” TO COVER THE INLAND U. S. AND DETERMINE WHO WILL DRIVE THIS COVERAGE AND HOW
RECOMMENDATIONS

EPA/DOT PARTICIPATE IN MODIFYING OR CREATING OSRO GUIDELINES FOR RIVERS, CANALS, AND LAND SPILLS (INCLUDING NON-NAVIGABLE AND DAMMED WATERWAYS, AND THOSE WITH NO COMMERCIAL BOAT TRAFFIC)
RECOMMENDATIONS

USCG, EPA AND DOT CONSULT ABOUT RIVER AND CANALS ISSUES TO ESTABLISH INLAND COMPLIANCE CITIES FOR OSRO CLASSIFICATIONS
RECOMMENDATIONS

EPA AND DOT PROVIDE
RECOMMENDATIONS TO
FACILITY PLAN HOLDERS
ON OSRO SELECTION
FOR RIVERS AND CANALS
RECOMMENDATIONS

DEVELOP

GEOGRAPHICAL RESPONSE PLANS

AS A PART OF

FACILITY RESPONSE PLANS AND

REGIONAL PLANS
RECOMMENDATIONS

DEVELOP A SYSTEM FOR DETERMINING

OSRO COMPETENCY

AND

PROVIDE

TRAINING CERTIFICATIONS

FOR PERSONNEL
CONCLUSION

WITHOUT SOME OUTSIDE SUPPORT FOR INLAND OIL COMPANIES IN THE EVENT OF A SPILL,
THE POTENTIAL FOR THE LOSS OF VALUABLE NATURAL RESOURCES IS GREAT.