

US EPA ARCHIVE DOCUMENT

The Preparedness Assessment Process & RRI

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OPA 90 called for a National Response Unit (now called NSFCC) to compile and maintain a comprehensive computer list of spill removal resources, personnel and equipment that is available worldwide...and of information regarding previous spills, including data from universities, research institutions, State governments, and other nations, as appropriate, which shall be disseminated as appropriate to response groups and area committees, and which shall be available to Federal and State agencies and the public.

NSFCC's Response Resource Assessment Branch (RRAB) captures response resource information from OSRO and non-OSRO resources, from national and international organizations. As we say in our Logistics/Inventory Division, "all points lead to the Response Resource Inventory (RRI)."

RRAB's main order of business has been verifying OSRO resources since the OSRO program's inception in 1997. **The new challenge for this branch is twofold: how to best grow the RRI in both scope and functionality. The Preparedness Assessment process is the primary tool used toward this end. This paper will examine the changes that have occurred recently in the CG (Sectors), within the RRAB, and those that will occur in the near future, to ensure we meet our challenges.** The impact of this effort is an overall strengthening of the National Response System, which in of itself raises global standards in prevention, preparedness, response and restoration by enhancing the information availability to all the players during an oil spill or hazardous materials release event.

The Coast Guard has undergone a major reorganization, one which combines two major mission areas, Operations and Marine Safety, in a way never conceived of in the past. This reorganization has already occurred from Headquarters down to most of the Districts and field units. Typical Operations units are Groups and Air Stations. Typical Marine Safety Units are Marine Safety Offices (MSOs), Detachments, and Field Offices. In the past Groups and MSOs have combined to become Group/MSOs, Sections or Activities. At the field level, these combined units are now being called "Sectors." The purpose of creating Sectors was best described in a message from then Commandant, Admiral Collins, in ALCOAST 010/04 (internet: <http://www.uscg.mil/hq/mcpocg/1geninfo/cgsectors.htm>): TO STRENGTHEN UNITY OF COMMAND IN OUR PORT, WATERWAY AND COASTAL AREAS OF OPERATION, I HAVE DIRECTED THAT NEW INTEGRATED OPERATIONAL FIELD UNITS BE ESTABLISHED THROUGHOUT THE COAST GUARD. THIS IS IN KEEPING WITH THE EXPRESSED INTENT OF IMPROVING READINESS IN MY COMMANDANTS DIRECTION. THESE NEW COMMANDS - TO BE CALLED SECTORS - WILL BE BETTER MATCHED TO CURRENT MISSION CHALLENGES, WILL BETTER ALIGN OUR FIELD OPERATIONAL CAPABILITIES AND WILL IMPROVE OUR MISSION PERFORMANCE. THIS INITIATIVE WILL BEST POSITION THE COAST GUARD TO SUPPORT OUR SECRETARY IN ACHIEVING UNITY OF PURPOSE AS ONE TEAM FOR ONE FIGHT. SECTORS WILL BE BASED ON A STANDARD ORGANIZATION MODEL THROUGH WHICH WE WILL INTEGRATE THE FUNCTIONS NOW PERFORMED SEPARATELY BY GROUPS, MARINE SAFETY OFFICES, VESSEL TRAFFIC SERVICES AND IN SOME CASES, AIR STATIONS.

This change to Sectors is much more than a name change; it is a change in mindset, a blending of units to increase communication and cooperation and recognition that any emergency response is best handled when one person is directly responsible for multi-asset assignment and coordination. There is new terminology for the staff leadership (Sector Commander), departments that mirror the Incident Command System structure (Prevention (Planning), Response (Operations), and Logistics), new military career paths, and most importantly for the response community, changes in Captains of the Port (COTPs).

Generally speaking, a Sector Commander can retain or delegate his COTP authority. Specifically, significant changes have already occurred in our formerly designated COTPs. MSOs that previously had COTP authority are now Marine Safety Units (MSUs) with no COTP authority (Chicago, Cleveland, Huntington, Paducah and Toledo). Other MSOs became MSUs, retained their COTP authority, but report to a Sector (Duluth, Pittsburgh, Port Arthur, Savannah, Morgan City and Wilmington). MSU Wilmington no longer has COTP authority over all of North Carolina, but instead just over the Cape Fear River Area. Sector North Carolina, located 95 miles north of Wilmington in Atlantic Beach has COTP authority over the remainder of North Carolina. Many units retained their names when they became Sectors, but some Sector unit names are new: Ohio Valley, Upper Mississippi, Lower Mississippi, Northern New England, Southern New England, and Delaware Bay, among others. Some Sectors that retained their former names have changed their physical location, such as Hampton Roads, which is located in Portsmouth vs. Norfolk. Figures (1a & 1b) identify the transitions that have occurred thus far.

Unit-Sector Transition		
Original Unit	New Unit	COTP Authority?
District 1		
MSO Portland, ME	Sector Northern New England	Yes
MSO Boston	Sector Boston	Yes
MSO Providence	Sector Southern New England (Pending)	Yes
Group/MSO Long Island Sound	Sector Long Island Sound	Yes
Activities New York	Sector New York	Yes
District 5		
Group/MSO Philadelphia	Sector Delaware Bay	Yes
Activities Baltimore	Sector Baltimore	Yes
MSO Hampton Roads	Sector Hampton Roads	Yes
Group Fort Macon	Sector North Carolina	Yes
MSO Wilmington	MSU Wilmington (reports to Sector North Carolina)	Yes (Cape Fear River Sub-zone)
District 7		
MSO Charleston	Sector Charleston	Yes
MSO Savannah	MSU Savannah (reports to Sector Charleston)	Yes
MSO Jacksonville	Sector Jacksonville	Yes
MSO Tampa	Sector St. Petersburg	Yes
MSO Miami	Sector Miami	Yes
MSD Marathon	Sector Key West	Yes
MSO San Juan	Sector San Juan	Yes
District 8		
MSO Louisville	Sector Ohio Valley	Yes
MSO Pittsburgh	MSU Pittsburgh (reports to Sector Ohio Valley)	Yes
MSO Paducah	MSU Paducah (reports to Sector Ohio Valley)	No
MSO Huntington	MSU Huntington (reports to Sector Ohio Valley)	No
MSO St. Louis	Sector Upper Mississippi	Yes
MSO Memphis	Sector Lower Mississippi	Yes
MSO Mobile	Sector Mobile	Yes
MSO New Orleans	Sector New Orleans	Yes
MSO Morgan City	MSU Morgan City (reports to Sector New Orleans)	Yes
MSU Baton Rouge	MSU Baton Rouge (reports to Sector New Orleans)	No
MSU Houma	MSU Houma (reports to Sector New Orleans)	No
MSO Houston/Galveston	Sector Houston-Galveston	Yes
MSU Galveston	MSU Galveston (reports to Sector Houston-Galveston)	No
MSO Port Arthur	MSU Port Arthur (reports to Sector Houston-Galveston)	Yes
MSU Lake Charles	MSU Lake Charles (reports to MSU Port Arthur)	No
MSO Corpus Christi	Sector Corpus Christi	Yes

Figure (1a)

Unit-Sector Transition		
Original Unit	New Unit	COTP Authority?
District 9		
Group/MSO Sault Ste. Marie	Sector Sault Ste. Marie	Yes
MSO Duluth	MSU Duluth (reports to Sector Sault Ste. Marie)	Yes
MSO Buffalo	Sector Buffalo	Yes
MSO Cleveland	MSU Cleveland (reports to Sector Buffalo)	No
MSO Detroit	Sector Detroit	Yes
MSO Toledo	MSU Toledo (reports to Sector Detroit)	No
MSO Milwaukee	Sector Lake Michigan	Yes
MSO Chicago	MSU Chicago (reports to Sector Lake Michigan)	No
District 11		
MSO San Francisco	Sector San Francisco	Yes
MSO Los Angeles-Long Beach	Sector Los Angeles-Long Beach	Yes
MSO San Diego	Sector San Diego	Yes
District 13		
MSO Puget Sound	Sector Seattle	Yes
Group/MSO Portland, OR	Sector Portland	Yes
District 14		
MSO Honolulu	Sector Honolulu	Yes
MSO Guam	Sector Guam	Yes
District 17		
MSO Anchorage	Pending	Yes
MSO Juneau	Pending	Yes
MSO Valdez	Pending	Yes

Figure (1b)

The impact of these changes in COTPs is evident if you are aware that the OSRO Classification Program uses the COTP location as its datum for determining classification. With some former COTPs non-existent, and locations changed for other COTPs, changes in OSRO classification are inevitable. Our goal at NSFCC has always been to strengthen the National Response System. The steps we are taking thus far to address these changes in COTPs and locations are as follows:

- (1) In January 2006, NSFCC personnel met with our program manager, formerly G-MOR but renamed G-RPP, who is responsible for policy decisions. During that meeting we proposed an option that if implemented, could potentially result in no changes in classification to those OSROs currently classified in Chicago, Cleveland,

Huntington, Paducah and Toledo. Other options were discussed that could result in changes in classification, but we requested that any changes in classification be phased in.

(2) Our RRI database manager is loading the specific COTP location information into the RRI and evaluating the impact of these changes in COTPs on our currently classified OSROs. For OSROs that have been classified since the formation of Sectors, classification letters sent to the companies - explain the changes in CG Units for the COTP zones the OSRO was evaluated in and we explain that their classifications may change pending evaluation of changes in COTPs.

(3) Another option is to establish some other datum for classification other than COTP location. Several possibilities would be (a) an area with a high concentration of facilities; (b) an area with high tank vessel traffic (transit, lightering or transfer); (c) a remote area that would be difficult to reach for a response; and (d) an area with a concentration of pipelines. Any discussions of this sort would need prior approval from G-RPP and involve multiple meetings with EPA, PHMSA, MMS and industry representatives.

The shifting in COTPs is a huge change, to be sure. Other changes have occurred over the years in the Response Resource Assessment Branch (formerly the OSRO branch) that challenge the growth of the RRI. Some of these changes are positive challenges, in that they will result in the expansion of the RRI:

(1) The branch of four military personnel (a Lieutenant, a Lieutenant Junior Grade, a First Class Marine Science Technician (MST) Petty Officer and a Senior Chief Storekeeper) has changed out in its entirety several times. This 2006 transfer season,

half the branch will transfer. In an effort to ensure the good work already achieved continues on, the Branch Chief has (or will have by then) established processes for all aspects of what the branch does. There is also continuity in that both the RRI Database Manager and the Logistics/Inventory Division Chief (under which the RRAB falls) are both Coast Guard civilians with a long history at the NSFCC.

(2) One of the major achievements of the branch was the cooperative creation of a skimmer testing protocol (between Coast Guard and MMS's Ohmsett Test Facility), to allow manufacturers to prove their skimmers can achieve a greater Effective Daily Recovery Capacity (EDRC) (source: 33CFR154 Appendix C, 6.2.1/33CFR155 Appendix B, 6.2.1) vs. having their skimmers automatically assigned an efficiency factor of 20% (source: 33CFR154 Appendix C, 6.3.1/33CFR155 Appendix B, 6.2.1). Skimmers with a higher EDRC can make the difference in achieving classifications for some OSROs. Whichever EDRC is greater, the computed value or the tested value is the one that will be entered throughout the RRI, necessitating program logic to test for that type of skimmer and use the correct EDRC.

(3) In October 2003, a panel was held that occurred between the Coast Guard (NSFCC & HQ), EPA (OSCs) and industry reps (Dowcar, Montana Refining Company) to discuss the lack of OSRO coverage in the Western United States. This discussion occurred followed a paper presentation on the same issue at IOSC earlier that year. The outcome of the discussion was that we would include EPA Regional Administrators on our correspondence designating newly-classified OSROs and on our correspondence sent prior to and after a PAV. More importantly, we came away with a list of potential inland Alternate Classification Cities (ACCs). It is believed that with additional ACCs,

companies that can't currently meet the response times necessary to become classified OSROs before will now be able to do so, not only strengthening the National Response System but potentially increasing the number of OSROs that can respond to inland-specific environments. The effect on the RRI would be additional locations to process when an OSRO requests classification.

(4) In January 2005, the Coast Guard (NSFCC & HQ) and PHMSA (then RSPA) met to discuss our Preparedness Assessment Visit (PAV) process and our OSRO Guidelines. The outcome of the discussion was that we would include PHMSA on our correspondence designating newly-classified OSROs and on our correspondence sent prior to and after a PAV. Additionally, PHMSA suggested more inland ACCs, located near remote sections of pipeline. These were added to the list generated by the CG-EPA-Industry discussion and passed to G-RPP in January 2006.

(5) The OSRO Guidelines were last revised in 2001. Recently, they have been reviewed in an effort to clarify the information within. In addition to doing this, "considerations" pages have been proposed to specifically address inland response issues. Some of these issues include:

- (a) Fast water response – equipment, pre-planning, anchoring systems, booming techniques.
- (b) Extreme cold weather – oil recovery, oil containment, techniques for access on frozen waterways, protection of personnel, pre-planning for safe decontamination of personnel (to avoid hypothermia).

(c) Specialized equipment – response in hard to reach areas such as near cliffs, or heavy-brush areas. Also, specialized equipment needed to respond to Group V oils which sink in a water column.

(d) Multi-state response – planning for a response that may cross into another state due to a fast moving waterway or other environmental issue (such as the multiple devastation experienced with Hurricanes Katrina, Rita and Wilma in 2005).

In no way should any of the information in these “considerations” pages be construed as classification requirements, nor will there be any changes made to the OSRO Guidelines during this review that would implement an additional financial burden on our classified OSROs, current or future. Once a suitable draft is ready, the OSRO Guidelines will be sent to G-RPP for review, in addition to EPA, PHMSA and MMS personnel. These changes in the OSRO Guidelines will probably have a minor effect on the RRI, depending on what stage the conversion of the RRI is in.

The information in the RRI is not currently available to the public. In addition, the information captured is only a small piece of that mandated by OPA 90. Recently, the effort to convert the RRI to a publicly available (internet), secure, more robust RRI was made via a contract advertisement on www.fedbizopps.gov, under GSA schedules 899 (Environmental Services) and 70 (Information Technology). Several companies bid on the contract but the process was stopped once we realized we wouldn’t have the necessary initial and recurring funding. Efforts are being made on multiple fronts to acquire that funding so we can ultimately better serve our customers: response companies, FOSCs and other government agencies.

Enter the Preparedness Assessment Visit (PAV). This process is how we are currently doing our best to serve our customers, and bring more customers onboard. The PAV process has evolved from simply verifying an OSROs resources to providing training, purpose and results to all involved. PAVs are aligned with the Preparedness for Exercise (PREPEX) program. Six months before a PREPEX will occur; the RRAB begins planning the PAV. The current PREP Schedule is advertised in the Federal Register /Vol 69, No. 24. The schedule identifies which units will undergo an Industry-led or a Government-led exercise. Typically, the RRAB does PAVs for Government-led exercises only. The schedule for the PAV's is created once the dates for the PREPEXes are set., and is sent as an attachment to a letter sent at the beginning of the year from the CO, NSFCC to all COTPs, EPA, PHMSA and MMS. This year's schedule is in Figure (2).

COTP/EPA Region	Start PAV Planning	PAV Dates (Subject to Change)	Attendee(s)	PREPEX Dates
Sector Portland (OR)	Oct 2005	Jan 2006	LCDR Midkiff MST1 Legutki	March 20-24 PREP POC: LT Phillips
Sector Houston-Galveston	Nov 2005	Feb 2006	LCDR Midkiff LTJG Warren	April 24-28 PREP POC: Jackie Stevens
Sector Buffalo MSU Cleveland	Jan 2006	Apr 2006	SKCS Meekins LTJG Warren	June 5-9 PREP POC: Dennis Cashman
Sector Jacksonville	Apr 2006	Jul 2006	MST1 Legutki New Personnel	September 11-15 PREP POC: Jason Maddox
EPA Region IX	May 2006	Aug 2006	LTJG Warren New Personnel	October 9-13 PREP POC: Jackie Stevens
Sector Hampton Roads	Jun 2006	Sep 2006	All	November 13-17 PREP POC: Dennis Cashman

Figure (2)

There is flexibility built into this schedule; it affords both the NSFCC and the unit undergoing the PAV to work together to come up with the best week (typically) to visit all OSROs with owned resources in a 70-mile radius of the drill location or the COTP location if the drill location is unknown. The overall process for a PAV is outlined in figure (3).

PREPAREDNESS ASSESSMENT VISIT
PROCESS STEPS

6 Months Prior to Exercise

NSFCC/G-RPP attend Regional Response Team (RRT) Meeting.

NSFCC notifies COTP of intended Preparedness Assessment Visit (PAV).

4-6 Months Prior to Exercise

NSFCC's Response Resource Assessment Branch (RRAB) assembles names, locations, and equipment listings for OSRO (& non-OSRO) response organizations located within a 70-mile radius of the exercise location.

RRAB coordinates scheduling the PAV with COTP as well as DRAT, EPA (as applicable) and other federal/state response agencies.

3-4 Months Prior to Exercise

RRAB completes the Preparedness Assessment Visit – verifying core resources

- Conducts in-brief with COTP/XO/OPS (First Day);
- Conducts classroom training on federal regulations, job aid, Average Most Probable Discharge (AMPD) coverage;
- Conducts onsite verifications of equipment and employee training;
- Observes operation of 10% of equipment;
- Conducts verbal out-brief with COTP/XO/OPS (Last Day).

Post Preparedness Assessment Visit Actions

RRAB prepares written After-Action Report (to COTP, info G-RPP, District, Strike Team).

RRI Database Manager updates RRI computer inventory information for OSROs (and add non-OSRO assets).

RRAB notifies OSROs of potential change in classification.

RRI Database Manager updates the OSRO matrix on the intra- and internet.

NSFCC reports results of PAV at the next RRT meeting.

Figure (3)

Second notification of a PAV comes by letter from the CO, NSFCC once an initial point-of-contact at the unit has been established. The contents of that letter are found in Figure (4). Enclosures to the letter include the above process and a list of the RRAB & RRI staff.

1. On dd-dd Month Year, the National Strike Force Coordination Center (NSFCC) will conduct a Preparedness Assessment Visit to your Area of Responsibility (AOR). The purpose of this visit is to evaluate the emergency response resources available to the COTP, including those found at classified and non-classified Oil Spill Removal Organization (OSRO) sites, other government agencies, and other emergency response organizations (ex. marine salvage, hazardous material release response). This information will be added to the OPA 90-mandated Response Resource Inventory (RRI) database. The dates for this visit were selected based on the Preparedness for Response Exercise Program (PREP) exercise scheduled for the week of dd-dd Month Year . This will allow time to address any potential issues identified during this PAV. The itinerary for this visit is still being finalized; once complete, it will be sent to our point of contact at your unit.
2. As part of our visit, my staff would like to have an in-brief with you or your representative and conduct an OSRO classification guidelines training session with all interested parties from Coast Guard, state, and local industry oil response personnel. The training typically lasts approximately 50 minutes. Upon completion of our visit, we would also like to conduct an out-brief.
3. We have been coordinating this visit with <unit POC name> of your staff to ensure all lanning and scheduling concerns are addressed and resolved promptly. If you have any questions or comments for my staff regarding this visit, please do not hesitate to contact LCDR Barbara Midkiff at the above listed number.

Figure (4)

Final notification of a PAV comes by letter from the CO, NSFCC once the OSRO visitation schedule is complete. The contents of that letter are the same as that in Figure (4) except a calendar identifying the dates/times/contact names & phone numbers of the OSROs to be visited and the RRAB staff is included as an enclosure.

As identified in the PAV process, we try to reach out to response organizations in the area. The purpose behind this is to encourage these organizations to list their response resources in the RRI. The RRAB developed a letter to give to these organizations to reinforce our efforts. The contents of that letter are included in Figure (5).

Dear Pollution Response Industry Representative:

The U. S. Coast Guard currently maintains a Response Resource Inventory (RRI) database which is used to store and access information about government and privately owned pollution response assets. It allows the Coast Guard to track the nation's pollution response capabilities and to provide various government, scientific, and civilian organizations with information to facilitate response. This tracking capability is of great value to the overall health of our national response system, and the inclusion of your resource information would be a valuable addition to our database. There are no requirements for you to list your resources; however, there are multiple benefits.

As a component of the RRI, the Coast Guard also has an Oil Spill Removal Organization (OSRO) classification program. This program is voluntary and is in addition to the existing regulatory facility and vessel plan holder requirements found in the Code of Federal Regulations. This classification program was developed as a tool to help ease the burden that facilities and vessels that store and transfer petroleum products face when writing their spill response plans. Federal statutes do not require a facility or vessel to have a Coast Guard Classified OSRO listed and employed in its response plan. However, by listing a Coast Guard classified OSRO in a response plan, facility and vessel plan holders receive the benefit of simply listing the OSRO by name rather than providing and updating detailed lists of the OSRO's available equipment. Additionally, having this information held in one centralized location eases the management of the information so that OSROs can more readily update their information in a timely fashion and know that their capabilities can be appropriately factored into National Response System planning efforts. There are several OSRO classifications offered based on the geographic region in which the OSRO operates the amount and location of its equipment and personnel, and the degree of control it has over these resources.

If you already have a local database, listing, website, etc., we would also like to include references to these information sources in our files. If you are interested in listing your resources in our database or in becoming a classified OSRO, please contact one of our staff listed in Enclosure (1). More information, including the OSRO classification program application package, is available on our website at:

<http://www.uscg.mil/hq/nsfweb/nsfcc/ops/osro.html>

We look forward to hearing from you. Your efforts to strengthen our national response system and to make our inventory program an accurate reflection of our nation's response capabilities are greatly appreciated.

Figure (5)

The after-action reports from PAVs we've completed since 2003 have contained recommendations for COTPs. These recommendations will likely be included in the aforementioned OSRO Guidelines:

(1) AMPD coverage. Prior to 2001, OSROs could be classified as A through E. The "A" classification was for AMPD response, which is no longer an OSRO classification. During several PAVs we identified potential shortfalls in AMPD coverage. It is the responsibility of the COTP to evaluate AMPD coverage during the plan review process. A job aid for evaluating AMPD coverage is available thru G-RPP and on the VRP-SOPEP web page at <http://www.uscg.mil/vrp/reg/ampd.shtml>.

(2) Out-of-Date OSRO data. Although OSROs are required to notify NSFCC when they go out of business, merge, sell a large amount of their assets, relocate equipment, etc. this doesn't always happen. It is impossible to continuously monitor every classified OSRO nationwide. Ultimately, it is the responsibility of each COTP to determine whether the response resources in their zone are adequate. This can be accomplished through frequent interaction and good working relationships with industry, participation in response drills, a thorough understanding of the merits and limitations of the OSRO classification program, and a comprehensive plan review program.

(3) Security Access: As more stringent security measures continue to be put into place, gaining access to restricted areas is becoming more of an issue, especially in ports with large waterfront facilities and a higher volume of ship traffic. When evaluating response plans, updating contingency plans, and conducting drills, it is important to take security and access issues into account. It is important to establish a system before an actual

incident so that response personnel, both government and non-government, can gain access to the necessary locations during a response.

(4) Specialized Response Needs: This was addressed to some extent above during the discussion of challenges to growing the RRI (examples given were fast current response and cold weather response). It is ultimately the responsibility of the COTP working with facility plan holders to ensure that local responders have the necessary equipment and training to deal with area-specific scenarios.

(5) Classified OSROs outside a 70-mile radius of the COTP zone: Under the OSRO classification program, a company is not required to have a local office; just is able to meet the time requirements for each tier of response. Many companies are technically able to meet these requirements by transporting their gear into an area via boat, truck, or plane, even though the gear is located outside the theoretical 2-hour (70 mile) radius. COTPs are encouraged to familiarize themselves with all classified OSROs for their respective COTP zones, as well as the non-classified OSROs which may often be smaller local companies.

In summary, the Response Resource Assessment Branch of the NSFCC's Logistics/Inventory Division is actively working from multiple directions to grow the Response Resource Inventory, using the Preparedness Assessment Visit process as its main tool to communicate the specifics of the OSRO Classification program and the importance of strengthening the National Response System by incorporating asset information from other response organizations.

The content of this paper is unofficial and not authority for action. Views and opinions expressed do not necessarily reflect those of the Department of Homeland Security or the Coast Guard.