# <u>OSROs</u>:

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

# **AN INDUSTRY PERSPECTIVE**

By

Dee Bradley and Carl Oskins DOWCAR Environmental Management, Inc. THE <u>NEED</u> FOR INLAND OSRO'S

### WESTERN U.S. HAS:

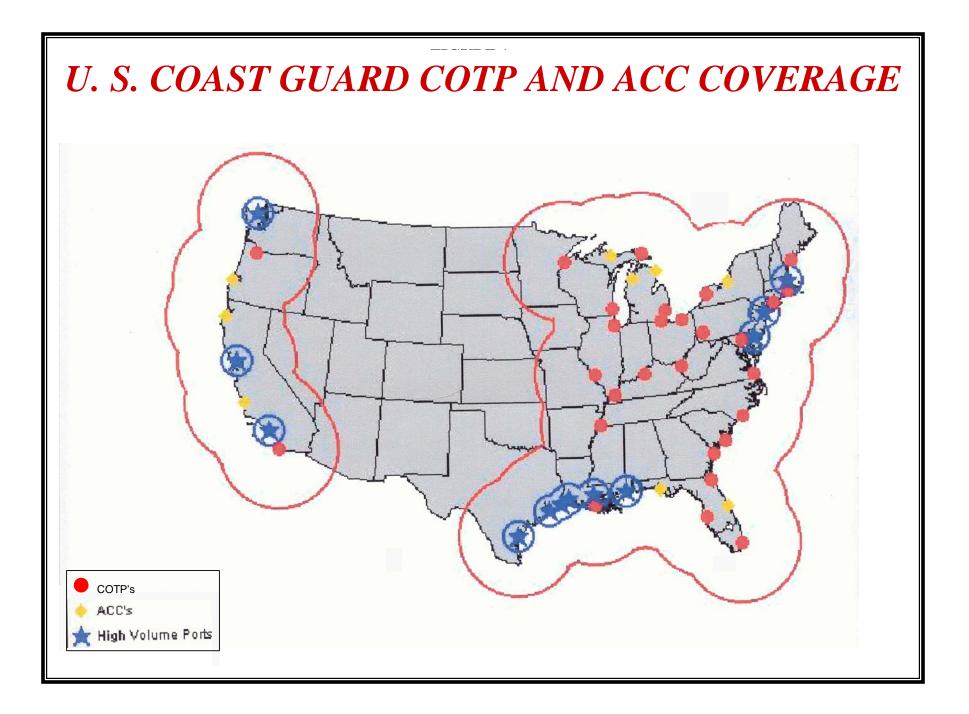
14.6% OF U. S. REFINERIES

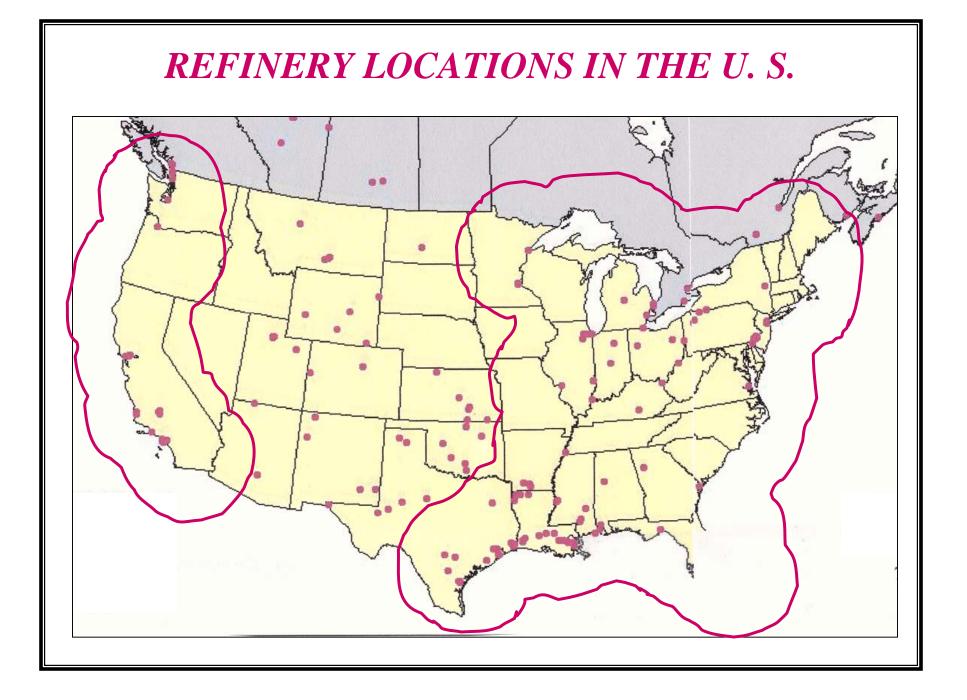
**NUMEROUS CRUDE OIL PIPELINES** 

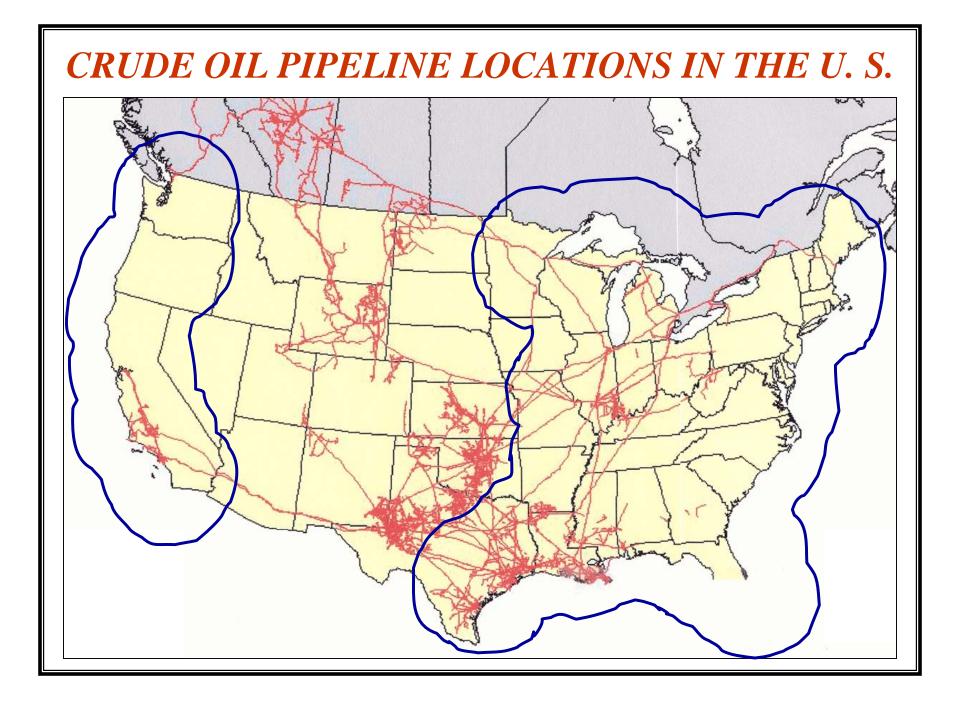
NINE OF THE TOP TWENTY OIL PRODUCING STATES

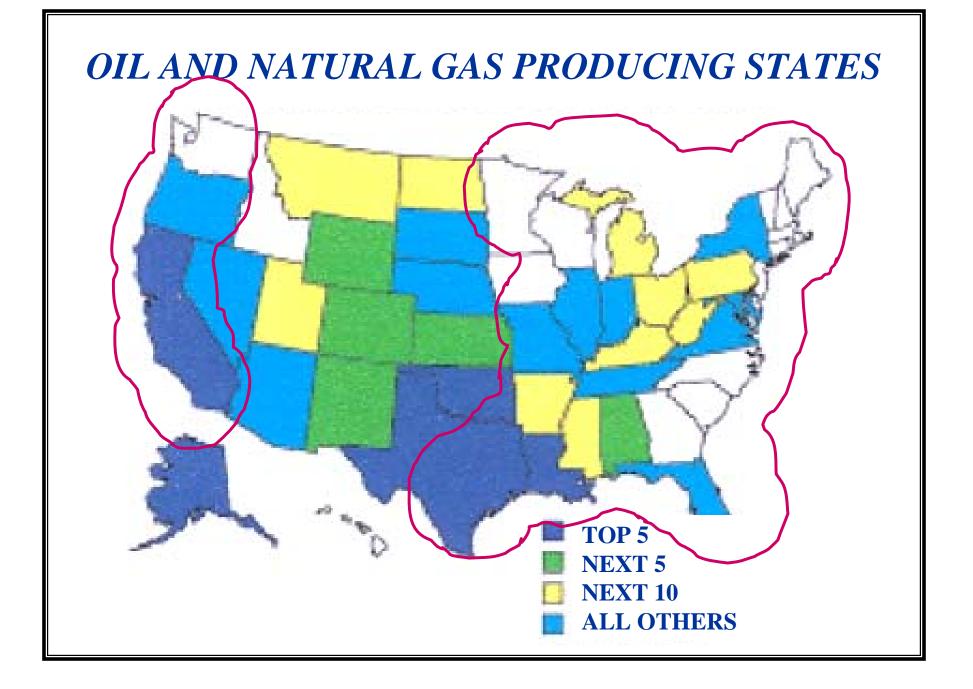
**VULNERABLE AREAS** 

NO U. S. COAST GUARD COTPs OR ACCs









**VULNERABILITIES** 

**PIPELINE CROSSINGS** 

**INLAND REFINERIES** 

**TERRORIST THREATS** 

**NUMBER OF INLAND SPILLS** 

70% OF ALL SPILLS OCCUR INLAND

#### **NATIONAL TREASURES**

GRAND CANYONYELLOWSTONE NAT'L PARKMESA VERDELAKE 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

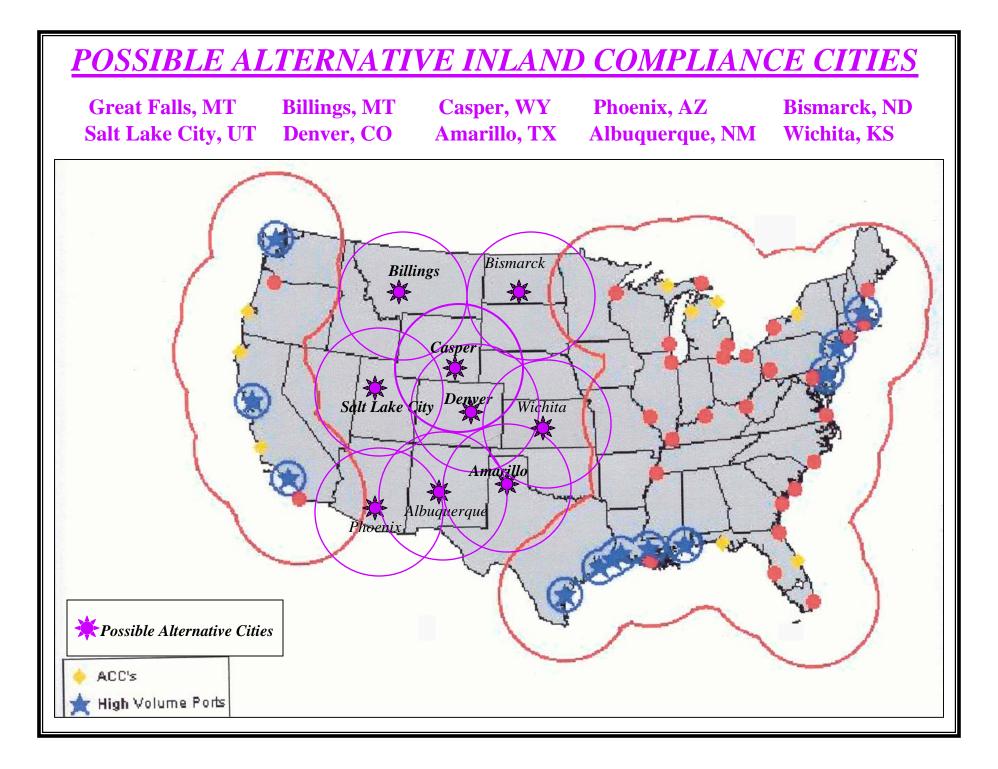


# **ALREADY HAS A PRESENCE**

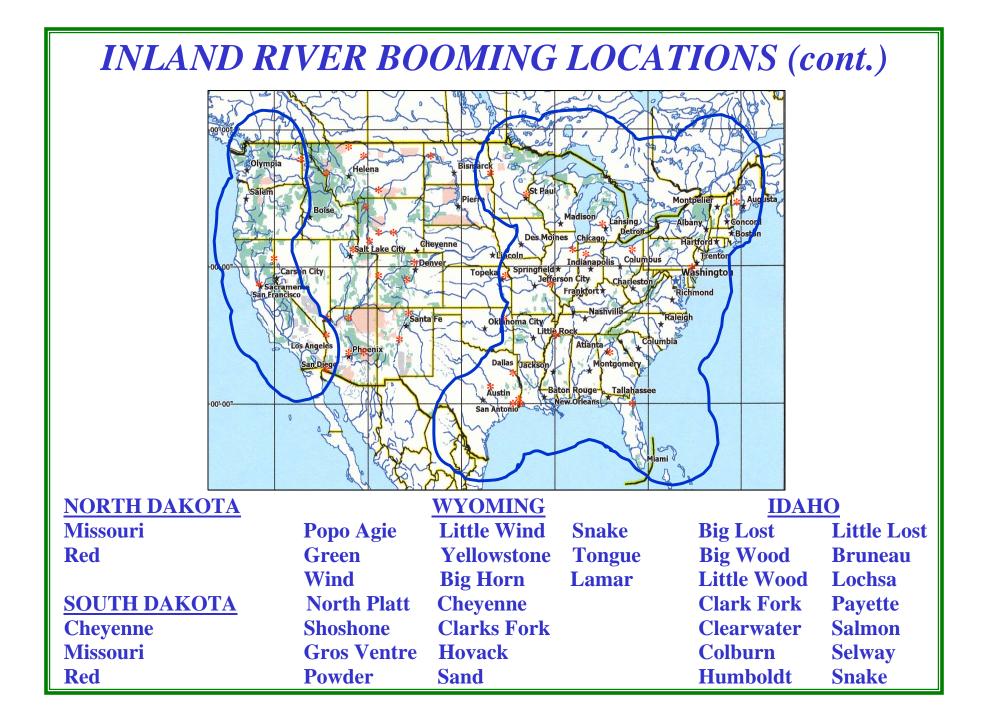
**TO CREATE NEW CLASSIFICATION CITIES** 

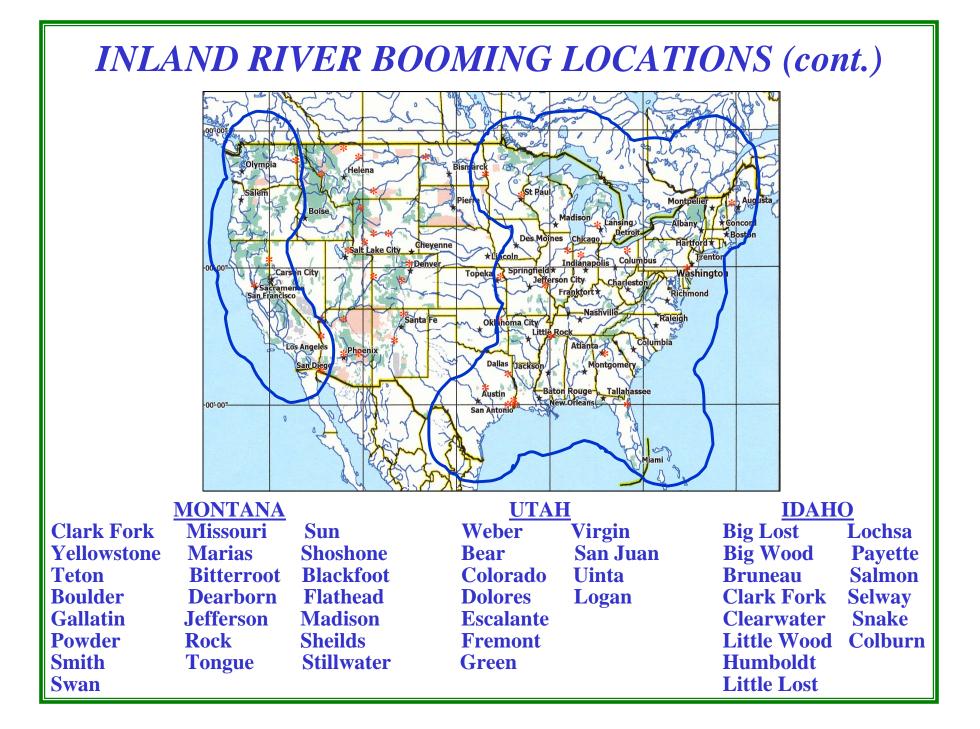
**CONTROLLED BY EPA/DOT CALLED** 

**INLAND COMPLIANCE CITIES** 









**EQUIPMENT DIFFERENCES** 

### **INLAND ENVIRONMENTS NEED:**

#### **SMALLER BOOM**





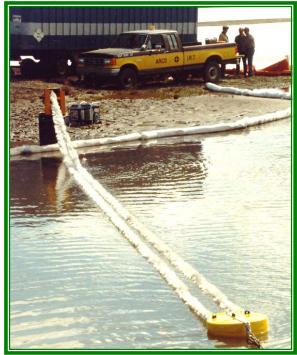
COASTAL

**INLAND** 

### **EQUIPMENT DIFFERENCES**

# **INLAND ENVIRONMENTS NEED:**

#### **SMALLER SKIMMERS**





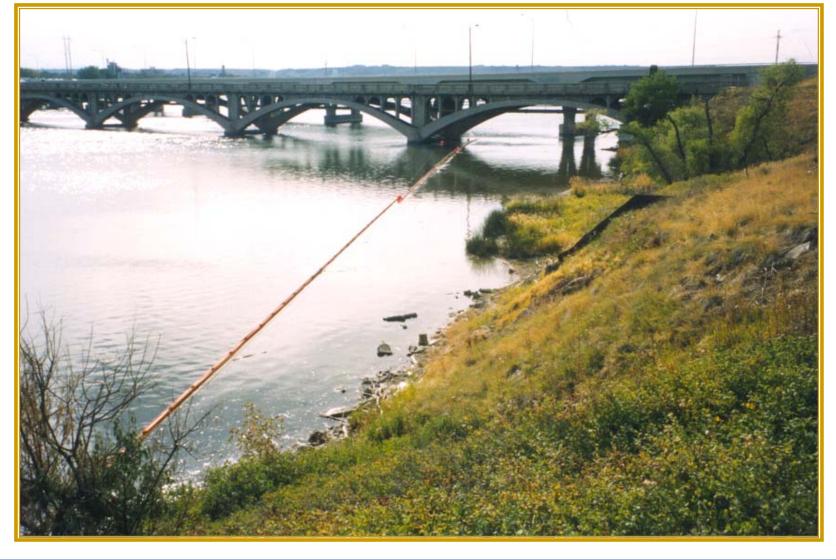


COASTAL

# 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

# **EPA AND DOT ESTABLISH**

*"INLAND COMPLIANCE CITIES"* 

# **TO COVER THE INLAND U.S.**

#### AND DETERMINE <u>WHO</u> WILL DRIVE

THIS COVERAGE AND <u>HOW</u>

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)

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

# EPA AND DOT PROVIDE RECOMMENDATIONS TO

FACILITY PLAN HOLDERS

ON OSRO SELECTION FOR RIVERS AND CANALS



# **DEVELOP**

#### **GEOGRAPHICAL RESPONSE PLANS**

# **AS A PART OF**

# FACILITY RESPONSE PLANS AND REGIONAL PLANS



#### **DEVELOP A SYSTEM FOR DETERMINING**

**OSRO COMPETENCY** 

#### AND

# PROVIDE

**TRAINING CERTIFICATIONS** 

**FOR PERSONNEL** 



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.*