<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:

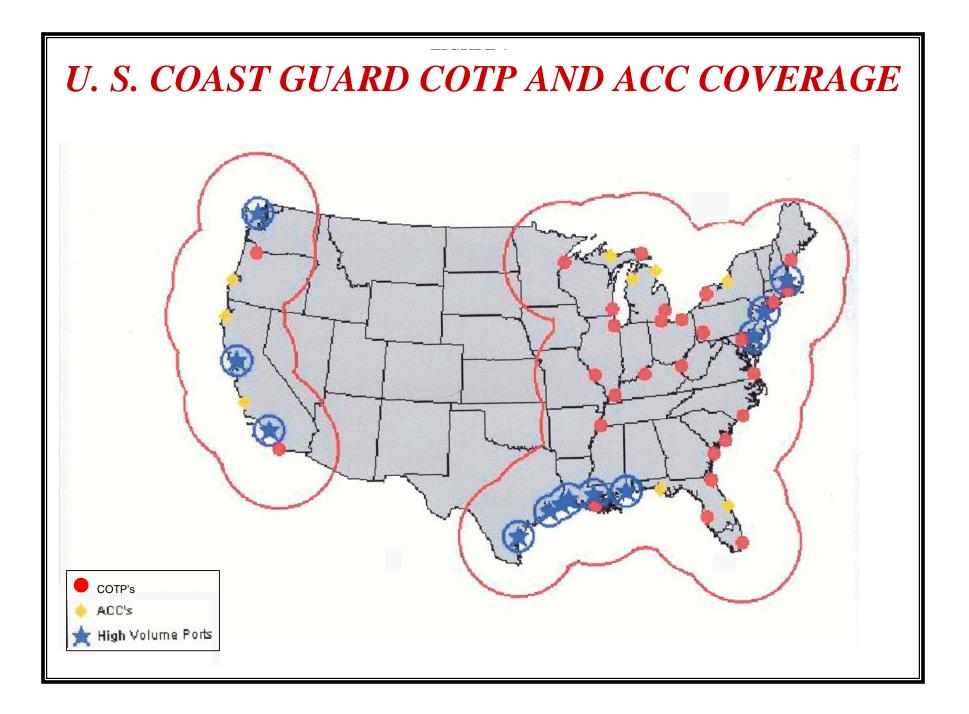
14.6% OF U. S. REFINERIES

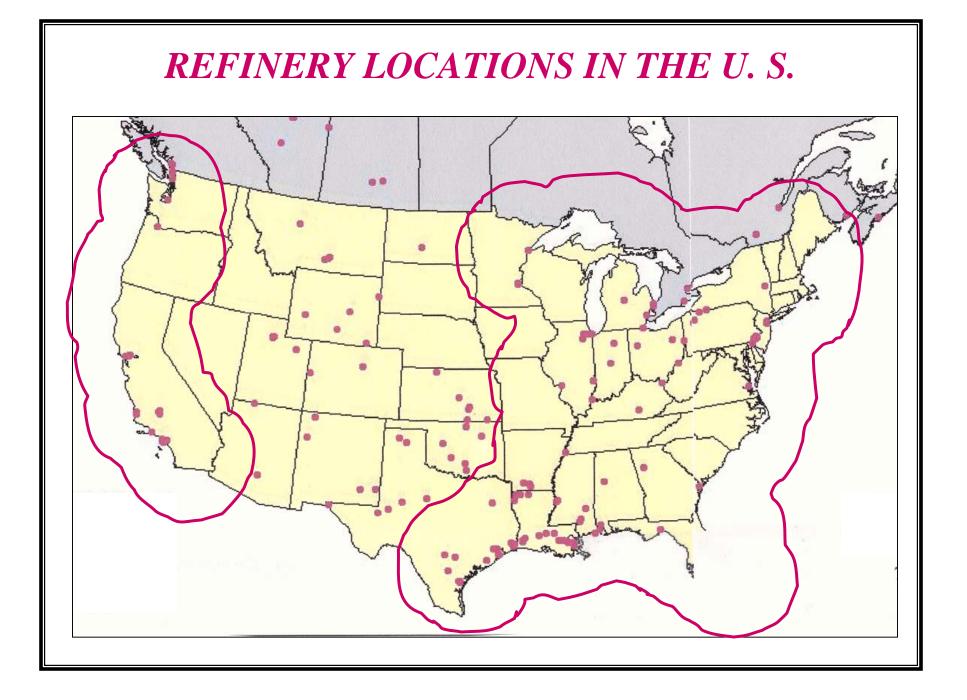
NUMEROUS CRUDE OIL PIPELINES

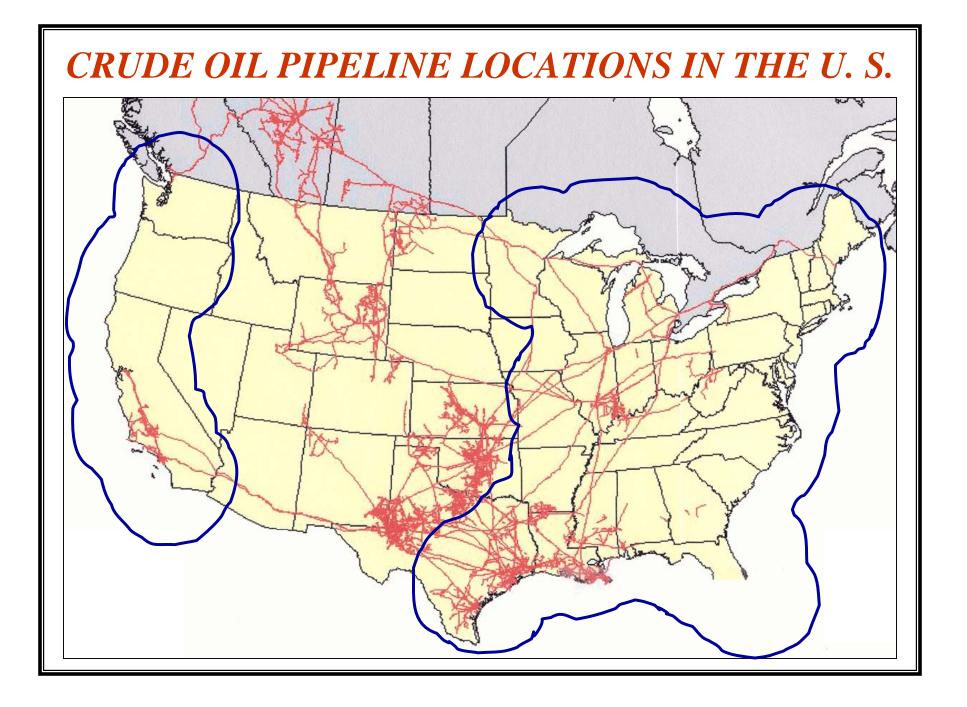
NINE OF THE TOP TWENTY OIL PRODUCING STATES

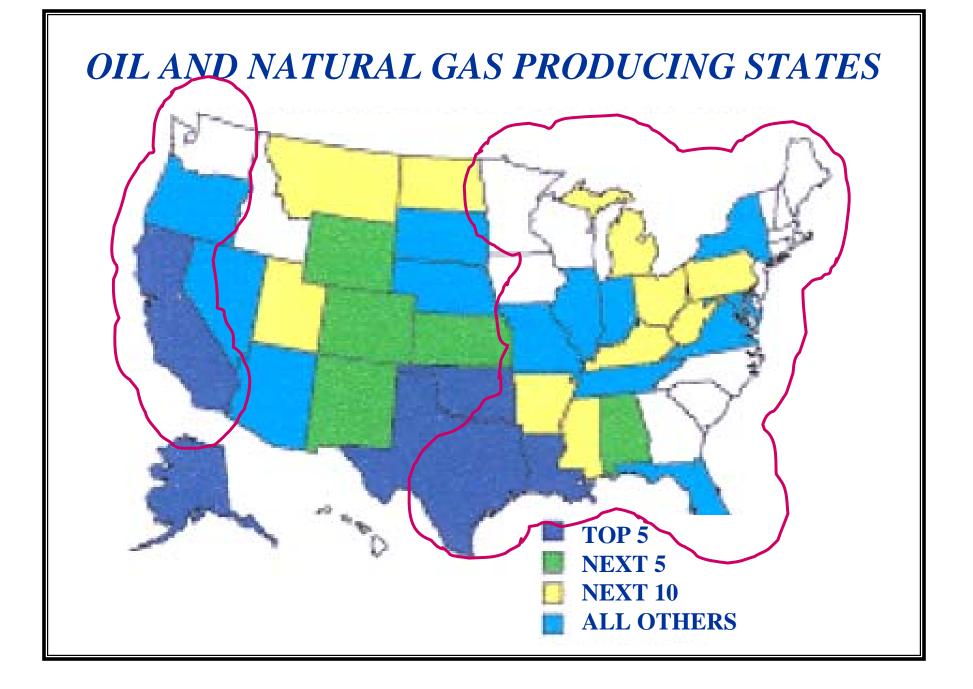
VULNERABLE AREAS

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

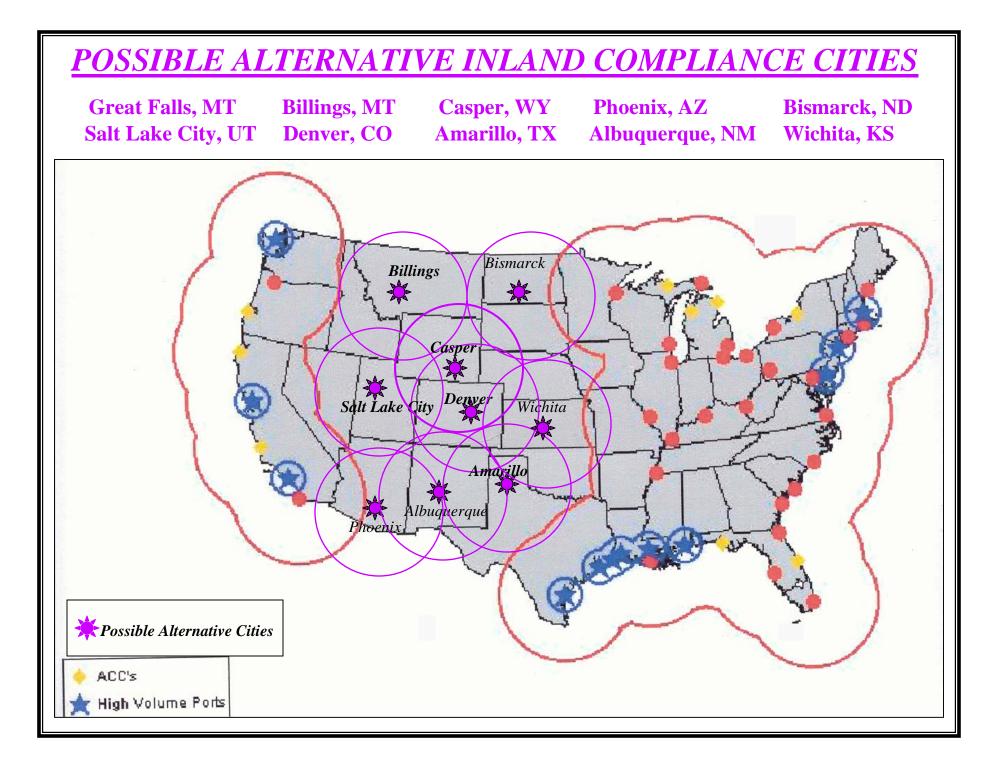


ALREADY HAS A PRESENCE

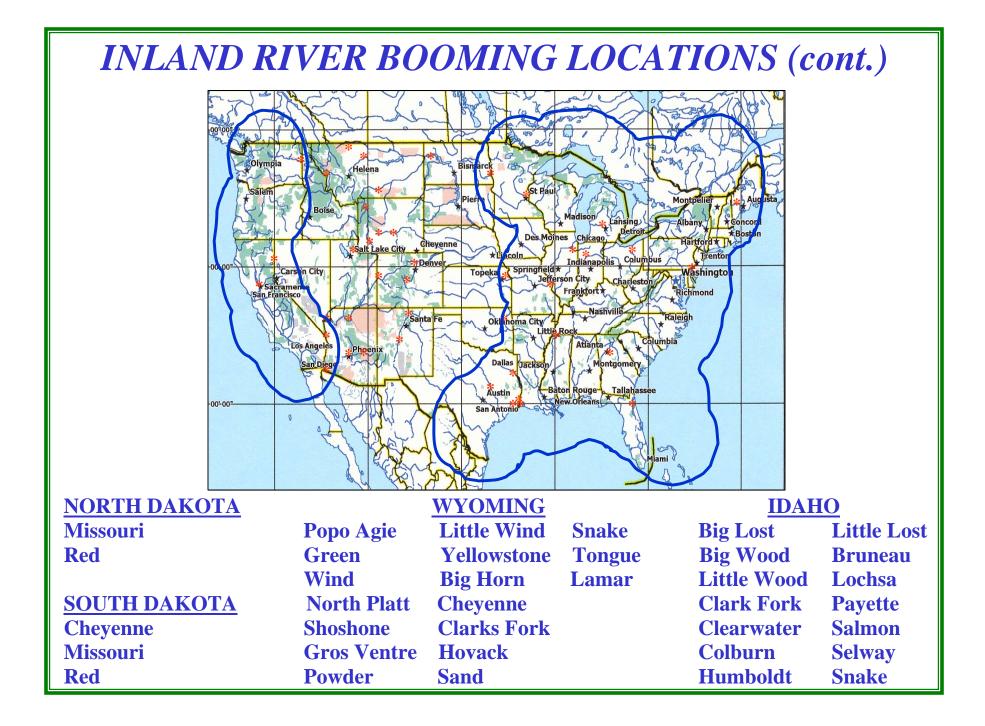
TO CREATE NEW CLASSIFICATION CITIES

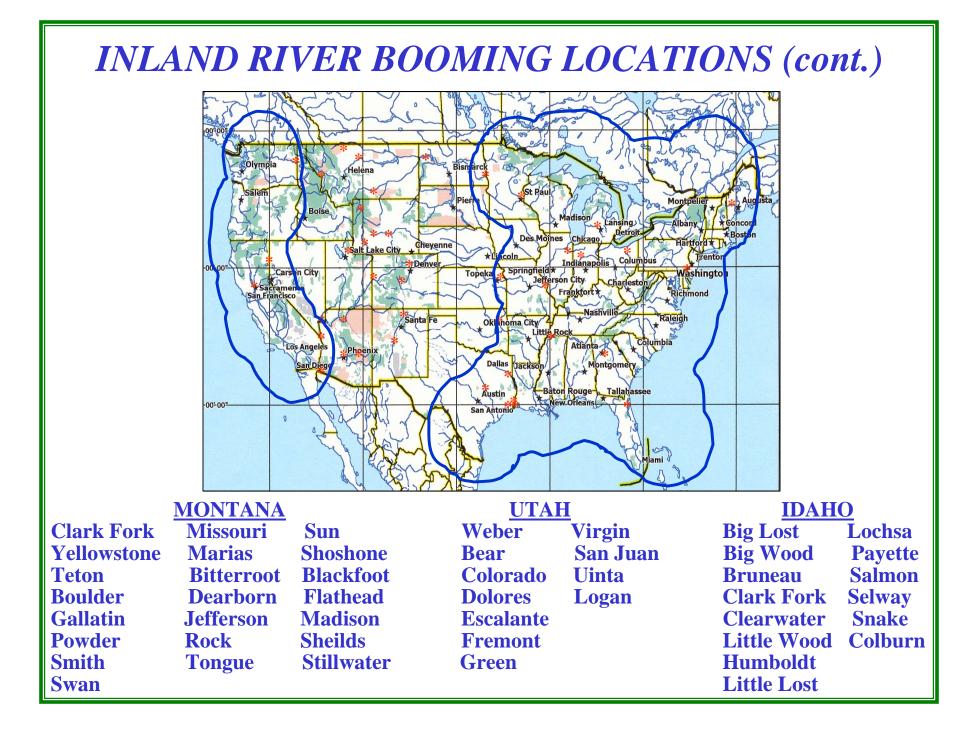
CONTROLLED BY EPA/DOT CALLED

INLAND COMPLIANCE CITIES









EQUIPMENT DIFFERENCES

INLAND ENVIRONMENTS NEED:

SMALLER BOOM





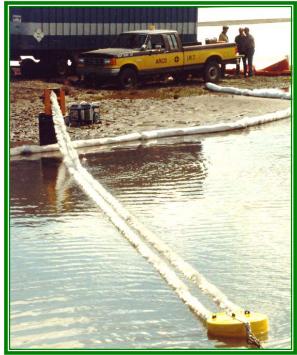
COASTAL

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.*