## USCG Regs for Group V Oils and OSRO Classification for Non Floating Oils

Mark Gregory, USCG D11 DRAT

The regulations for Group V oils for facilities and vessels are very similar. By highlighting the some of the similarities and a few of the subtle differences, it will intentionally generate some questions.

**33 CFR 154.1047(a)(1) and 33 CFR 155.1052(a)(1)** state that plan holders must identify procedures and strategies for responding to a WCD of Group V petroleum oils to the maximum extent practicable.

Both facility and vessel regulations require the plan holder take in to account operating conditions such as, Ice conditions, Debris, Temperature ranges and Weather-related visibility.

The regulations separate core resources into Detection, Containment, and Recovery Capabilities that impact assessment and other appropriate equipment.

There are some differences in wording for response times between the facility and vessel regulations.

**33 CFR 154.1047 (d)** Response resources identified in a response plan for a facility that handles, stores, or transports Group V petroleum oils under paragraph (c) of this section must be capable of being at the spill site within 24 hours of discovery of a discharge.

**33 CFR 155.1052 (d)** Response resources identified in a response plan under paragraph (c) of this section must be capable of being deployed within 24 hours of discovery of a discharge to the port nearest the area where the vessel is operating.

## Guidelines for the U.S. Coast Guard Oil Spill Removal Organization Classification Program March 2016

- In the March 2016, the new OSRO Guidelines included Chapter 6. OSRO Classification Guidelines for Nonfloating Oils.
- Heavy oils and Group V oils were merged and defined as "nonfloating oils".
- Plan holders that handle, store or transport oils that are not Group V oils, but fall
  under the nonfloating oil definition, are <u>highly recommended</u> to resource
  nonfloating oil classified OSRO's in addition to OSRO's already classified in the
  Mechanical classification program.
- Plan holders that handle, store or transport oils that are Group V oils <u>shall</u> utilize nonfloating oil classified OSRO's.
- Resources counted for OSRO classification can be owned or contracted.
- Eleven OSROs have received a nonfloating oil OSRO Classification, six in CA.
- Submitted requests were reviewed by CG District SMEs, NOAA SSC and CG HQ.
- Future plans are to complete Preparedness Assessment Visits and conduct NFO GIUEs, which the latter will provide challenges in planning and completing.