



Office of Spill Prevention and Response

Oil Spill Response Organization Rating Program Guidance Document

Background and Purpose

Owners or operators of vessels and facilities required to have a contingency plan approved by the Office of Spill Prevention and Response (OSPR) must identify and ensure, through a contract or other approved means, the availability of personnel and equipment to contain, recover, and temporarily store spilled oil and to provide protection of environmentally sensitive sites.

Plan holders meet this requirement by contracting with one or more oil spill response organizations (OSROs) that are rated to provide response resources required by OSPR's contingency planning regulations (described in Title 14 California Code of Resources (14 CCR), Subchapters 3-4). To receive a rating, an OSRO must submit a complete application and demonstrate response capabilities by successfully passing an unannounced drill or equipment verification inspection. A plan holder may provide their own response resources if they obtain an OSRO rating commensurate with their response resource requirements.

This guidance document describes the response capabilities for which OSPR issues OSRO ratings and provides guidance regarding how to find a rated OSRO. The audience for this guidance document includes OSROs, plan holders, plan preparers, and anyone interested in learning about response resource requirements and the OSRO rating program.

There are additional guidance documents for the OSRO Rating Program posted on the [OSRO web site](#), including:

- OSRO Application Guidance Document – *Coming Soon*
- Unannounced Drill & Equipment Verification Inspection Guidance Document – *Coming Soon*

The OSRO rating regulations are linked below:

- [Oil Spill Response Organization Ratings \(14 CCR § 819-819.07\)](#)

What is an Oil Spill Response Organization (OSRO)?

OSPR's regulations define an OSRO as an individual, organization, association, cooperative, or other entity that provides, or intends to provide, equipment, personnel, supplies, or other services directly related to oil spill containment, cleanup, or removal activities (§ 790 (o)(8)). State and federal agencies other than OSPR use other terms, such as primary response contractor or oil spill removal organization, to refer to the same organizations and set of response capabilities.

OSROs voluntarily apply to OSPR for a rating for the response capabilities they have to offer. Once rated, an OSRO may be listed in contingency plans to meet plan holders' requirements for containment, recovery, temporary storage, and protection of environmentally sensitive sites based upon the plan holder's location, operation, and reasonable worst-case spill (RWCS) volume.

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Before issuing a rating, OSPR verifies an OSRO's capability to effectively deliver response services through an unannounced drill or an equipment verification inspection. You can find more information about drills and inspections in the Unannounced Drill & Equipment Inspection Guidance Document (*coming soon*).

OSRO Capabilities

OSPR issues five types of OSRO ratings: marine on-water, inland on-water, terrestrial, environmental sensitive site protection (ESSP), and non-floating oils. Each rating type includes specific response capabilities that correspond to requirements established in OSPR's regulations. The OSRO Rating program centers around these plan holder response resource requirements, which are described for marine facilities, inland facilities, tank vessels, and non-tank vessels at 14 CCR § 817.02(d); § 817.03(d) § 814.04(n); § 818.03 (e), and § 827.02(h), respectively. Requirements for ESSP are described at § 828.1.

Although the OSRO rating program is based upon plan holder response resource requirements, OSROs are not required to meet plan holder requirements to be issued a rating. An OSRO may apply for and receive a modified rating to provide lesser quantities of response resources than required by the contingency plan regulations. An OSRO with a modified rating cannot be listed in a contingency plan to meet plan holder requirements, but the OSRO can still provide response resources and services.

Plan holder response resource requirements for on-water services are summarized in the [On-water Response Resource Requirements](#) spreadsheet posted on the [OSRO web site](#).

The contingency plan and ESSP regulations are linked below:

- [Marine Facilities, Small Marine Fueling Facilities, Tank Vessels \(14 CCR §§ 815.01-818.03\)](#)
- [Non-tank Vessels \(14 CCR §§ 825.01-827.02\)](#)
- [Inland Facilities \(14 CCR § 817.04\)](#)
- [Environmental Sensitive Site Protection \(14 CCR § 828.1\)](#)

On-water Capabilities

OSPR issues on-water ratings in both the marine and inland environments. Vessel and marine facility plan holders, as well as inland facility plan holders that pose impacts to perennial waters, must have response resources available to respond to a spill on water. To achieve an on-water rating, an OSRO must demonstrate the ability to effectively deploy containment boom, skimming systems for on-water recovery, and temporary storage.

Containment Boom

Containment boom is a floating barrier constructed of impermeable PVC fabric that is used to contain spilled oil. Boom is also used to exclude, deflect, and divert spilled oil from shorelines and sensitive areas. For containment boom, the boom draft plus boom freeboard ranges from 18 to 42 inches.

On-Water Recovery

On-water recovery involves using equipment to recover spilled oil from the water surface. This is typically achieved using skimming systems that remove oil by skimming and pumping it into temporary storage tanks on response vessels or on land. Common skimmer types include weir, drum, and brush skimmers.

OSPR uses effective daily recovery capacity (EDRC) to quantify on-water recovery requirements. EDRC is defined as the recovery capacity of skimming equipment, derated to reflect real-world

operational limitations such as weather, sea state, and currents. EDRC is calculated as 20% of the manufacturer's rated skimming capacity over a 24-hour period (§ 790 (e)(3)).

Temporary Storage

Temporary storage resources are required to store the spilled oil recovered by skimming systems. OSROs provide temporary storage resources via vacuum trucks and various types of portable tanks and bladders.

Environmental Sensitive Site Protection Capabilities

Vessels and marine facilities regulated by OSPR must provide for the protection of environmental sensitive sites identified within California's six Area Contingency Plans (ACPs). The ESSP regulations (§ 828.1) establish requirements for plan holders to have protective swamp or harbor boom that can be deployed to implement site strategies in the event of an oil spill.

To achieve an ESSP rating, an OSRO must possess the required amounts of protective boom and the resources and personnel to mobilize and deploy the boom within the time frames described in § 828.1.

Non-Floating Oil (NFO) Capabilities

Marine and inland facilities and tank vessels that handle non-floating oils (NFO) such as diluted bitumen and Group V residual fuel oils must contract with a rated OSRO for detection, containment, and recovery of NFO using equipment such as sonar, curtain boom, dredges, and assessment equipment (§ 817.02 (d)(5)(E); § 817.03 (d)(5)(C); § 817.04 (n)(4); § 818.03 (e)(5)(C)).

OSPR's standard for non-floating oil rating points to the U.S. Coast Guard's OSRO classification program. To obtain an NFO rating from OSPR, an OSRO must demonstrate that it has an NFO classification from the U.S. Coast Guard (§ 819.04 (a)(3)).

Terrestrial Capabilities

Inland facility plan holders that only pose impacts to intermittent and ephemeral waters of the state, where water is not always flowing, must have resources and capabilities to contain and store a spill impacting the dry portions of the waterway. Terrestrial containment and storage resources include equipment such as backhoes, bulldozers, vacuum trucks, and hydraulic cranes (§ 819.02 (c)(5)).

Geographic Regions for OSRO Ratings

Ratings for the OSRO capabilities described above are issued based upon the geographic areas in which an OSRO provides services.

Marine Environment

California's coastal zone is divided into six ACP regions, and each ACP is further divided into Geographic Response Areas (GRAs). Ratings for marine on-water services and ESSP are issued by ACP and GRA. An OSRO can apply for a rating in just one ACP or any combination of the six, and within an ACP, they can apply for any combination of GRAs.

The ACPs and GRAs can be viewed online via the Environmental Response Management Application (ERMA) at the following link: <https://erma.noaa.gov/southwest#layers=2+13946+13947+44859&x=-121.92928&y=36.60885&z=7&panel=layer>

OSPR's contingency planning regulations further divide the marine environment into risk zones, which determine the time frames and quantities of on-water resources that must be available to be brought to a spill site. These regions include high volume ports (HVP), oil pollution risk areas (OPRAs), facility transfer areas and the Santa Barbara Channel (FTA/SBC), and balance of the coast (BOC).

The on-water resource requirements are summarized at the On-water Response Resource Requirements spreadsheet on the [OSRO web site](#).

High Volume Ports (HVP)

There are two HVPs in California, each defined as a 50 nautical mile radius around specific geographic coordinates in the San Francisco Bay and Los Angeles/Long Beach Harbor areas (§ 790(h)(3)). OSPR-regulated vessels and marine facilities operating in an HVP must have a contract or other approved means for the on-water response resources required for HVPs.

Figure 1: High Volume Ports (HVP)



California's two high volume port zones, as viewed on the [Southwest Environmental Response Management Application \(ERMA\)](#). The HVP are defined as 50 nautical mile radii around specific latitude and longitude coordinates located in ACP 2 and ACP 5.

Oil Pollution Risk Areas (OPRA)

OPRAs are specific locations within HVPs where vessel traffic patterns and local conditions result in an elevated risk of an oil spill. The OPRAs are defined at § 818.02(e)(3)(B) and § 827.02(h)(2)(B). Vessels transiting within ½ mile of OPRAs have specific requirements for containment boom.

Figure 2: Oil Pollution Risk Areas (OPRA)



California's oil pollution risk areas within the HVP zones, as viewed on the [Southwest Environmental Response Management Application \(ERMA\)](#). There are eight OPRAs in ACP 2 and one OPRA in ACP 5. Vessels transiting within ½ mile of an OSPR have additional requirements for containment boom.

Facility Transfer Area (FTA) / Santa Barbara Channel (SBC)

FTAs are areas outside of HVPs where oil or oil products are transferred (§ 790(f)(2)). The Santa Barbara Channel is a specific FTA designated by OSPR's regulations (§ 790(s)(1)).

Balance of the Coast (BOC)

BOC refers to the areas along the California coast not designated as HVPs, FTAs, or SBC (14 CCR § 790(b)(1)). Response resource requirements for BOC are established for vessels only, not facilities.

Inland Environment

OSPR's regulations divide the inland environment into six Response Planning Areas (RPA), which correspond to the Local Emergency Planning Commission (LEPC) regions designated by the California Governor's Office of Emergency Services (CalOES). The RPAs are further divided by county, and OSRO ratings within the inland environment are issued by RPAs and counties. An OSRO may apply for an inland on-water, non-floating oil, or terrestrial rating in just one RPA or any combination of the six, and within an RPA, they can apply for any combination of counties.

The RPAs and counties can be viewed online via ERMA at the following link:

<https://erma.noaa.gov/southwest#layers=2+17017+13745&x=-119.65511&y=37.4076&z=6&panel=layer>

Response Time Frames

OSROs are rated to provide services within specified time frames ranging from 0 to 60 hours. The response timeframes are established in the vessel and facility contingency plan regulations (linked above), and the timeframes differ among marine facilities, inland facilities, tank vessels, and non-tank vessels (see § 817.02(d); § 817.03(d) § 814.04(n); § 818.03 (e), and § 827.02(h)).

The response timeframes and corresponding resource requirements for on-water containment, recovery, and temporary storage are summarized at the On-water Response Resource Requirements spreadsheet on the [OSRO web site](#).

The response timeframes and corresponding response resources requirements for environmental sensitive site protection are summarized in the Site Protection Table in § 828.1, which can be accessed at the link below:

- [Environmental Sensitive Site Protection \(14 CCR § 828.1\)](#)

Advance Notice for Services

For some response capabilities, locations, and time frames, OSROs may require advance notice from plan holders to allow for mobilization and staging of equipment and personnel. The allowable circumstances for which an OSOR may require advance notice are described in OSPR's regulations, as summarized below (§ 790(c)(10)(A)).

Advance Notice for On-water Services

- An OSRO may require 24-hour notice to provide immediate (0 and 1 hour) coverage during oil transfer operations.
- An OSRO may not require advance notice for on-water services for 2-hour timeframes and beyond.

Advance Notice for ESSP Services

- An OSRO may require vessel plan holders to provide 24-hour notice before operating in California waters to provide ESSP services in FTA / SBC only.
- Advance notice for vessel ESSP services is not allowed for HVPs.
- Marine facility plan holders cannot be required to provide advance notice for ESSP services.

Dedicated or Owned & Controlled Resources

Dedicated resources are committed to oil spill response and not used for other purposes that would hinder the ability to rely on the resources for spill response (§ 790(d)(2)). OSRO-owned and controlled resources are equipment and personnel employed directly by an OSRO (§ 790(o)(15)). OSPR's regulations require certain resources to be dedicated or OSRO-owned and controlled, as summarized below.

- All resources utilized to provide on-water containment, recovery, temporary storage, and environmental sensitive site protection services for the 0-6 hour time frames must be either dedicated or OSRO-owned and controlled. This includes response personnel in addition to equipment (§ 819.04(a)(1)).
- If any resources relied upon for the first six hours are subcontracted, the resources must be dedicated (§ 819.02(d)(4)).
- Resources used to provide terrestrial services are not required to be dedicated (§ 819.04(a)(1)-(2)).

- For ESSP, the minimum amounts of dedicated boom must be located or stored within California (§ 828.1(d)(3)).
- OSROs must specify whether response resources are dedicated, non-dedicated, OSRO-owned and controlled, or subcontracted on their application (§ 819.02(c)(1)).

Significant Changes in Response Resources

OSROs must notify OSPR when there is a significant change in equipment, personnel, management, or subcontracted equipment or personnel, 14 calendar days in advance of the change. If the change is unforeseen, oral notice must be provided immediately after the OSRO becomes aware of the change (§ 819.05(a)). Failing to notify OSPR of a significant change may result in the OSRO's rating being modified or revoked (§ 819.05(b)).

What is a Significant Change?

A significant change is one that would affect an OSRO's ability to respond consistent with its rating (§ 819.05(c)). What constitutes such a change depends on the particular ratings held and the level of redundancy within the existing resource base described in the OSRO's approved application. Changes to equipment relied upon to meet marine or inland on-water requirements for hours 0-6 are particularly consequential because these resources must either be dedicated or OSRO-owned and controlled, as described above. Changes impacting the required dedicated boom for ESSP may also be significant.

Generally, OSPR considers changes to equipment relied upon to meet on-water requirements for hours 0-6 to be significant, if the OSRO's application does not already include sufficient alternate resources. Changes in the availability of single pieces of equipment that account for large proportions of resource requirements, such as barges and skimming vessels, are considered significant changes. When in doubt, OSROs should proactively reach out to OSPR regarding planned and unplanned changes in resource availability.

Notification and Backup Resource Description

When notifying OSPR of a significant change, an OSRO must identify sufficient backup resources to maintain the OSRO's current ratings. To demonstrate that the backup resources are sufficient to maintain the OSRO's rating, the notification must include any applicable updates to the written plan of operations describing the mobilization and deployment of resources. The backup resource plans must be approved by OSPR.

How Does an OSRO Obtain a Rating?

OSROs voluntarily apply to OSPR for a rating by submitting an application via email to OSRO@wildlife.ca.gov that includes all the required contents described in § 819.02.

OSPR will review a complete application within 90 calendar days of receipt (§ 819.03(a)(1)). If the OSRO Rating Coordinator identifies deficiencies or has questions about an application, they will reach out to the applicant with instructions for what revisions are needed.

For additional information and guidance regarding the rating application process, see the OSRO Application Guidance Document (*Coming Soon*) on the [OSRO web site](#).

Once OSPR has determined that an application is complete, an unannounced drill or an equipment verification inspection will be conducted before a rating is issued.

For additional information on unannounced drills, see the Unannounced Drill & Equipment Verification Inspection Guidance Document (*Coming Soon*) on the [OSRO web site](#).

How to Find a Rated OSRO

OSPR posts information about rated OSROs on the [OSRO web site](#).

OSRO Matrices

The OSRO matrices are lists of rated OSROs organizations including details regarding what types of ratings they hold, the applicable geographic region, and the rating expiration date. The marine matrix covers marine on-water and ESSP ratings, and the inland matrix covers terrestrial and inland on-water ratings.

- [Marine On-water and ESSP Matrix](#)
- [Inland On-water and Terrestrial Matrix](#)

Contact List

OSPR also posts contact information for rated OSROs. The contact list includes the rating type for each rated OSRO and contact information for retaining their services, as well as 24-hour emergency contact information for each OSRO.

- [Rated OSRO Contact List](#)