

# **CALIFORNIA OSRO PERFORMANCE STANDARDS**

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## **BACKGROUND:**

California's Oil Spill Response Organization (OSRO) and Plan Holder Unannounced Drill Programs laid the foundation for State, Federal, and Industry partnerships to ensure that the best achievable response to oil spills in the State of California is attained. As a result of these two initial programs, the Office of Spill Prevention and Response (OSPR) is convinced that unannounced drills must be the cornerstone of a response resource assessment.

Unannounced drills presented an opportunity to measure and improve how OSROs and plan holders respond to oil spills by testing contingency plans, reviewing the systems approach, and revealing shortfalls that may hamper an oil spill response. The OSRO unannounced drills tested the OSRO's response capabilities for the first six hours of a response, while the plan holder drills tested the owner/operator's ability to initiate a response to a spill incident, based on their contingency plan, for the first three hours of a response. These unannounced drills were unique because the State determined and published performance standards for the volume of equipment deployed, the operation of response resources, the testing of non-tank vessels, the number of drills conducted, and added the element of surprise to evaluate how the person in command would respond during an actual emergency

These two programs revealed potential problems and solutions. Through legislation, the California Unannounced Drill Program has evolved into the basis of performance standards for OSROs applying to be rated in California. Under the new law, Assembly Bill 715 (AB 715), plan holders must now contract with one or more State rated OSROs to meet

contingency plan requirements. OSROs will only be granted a rating through unannounced drills, review of training records and physical inventories.

**DISCUSSION:**

In the OSRO rating process , proposed in California Code of Regulations, Title 14, section 819 (draft); OSROs will be rated for performance in containment booming, on-water recovery and storage, and shoreline protection services. OSROs will be rated by times in which response resources arrive on-scene and by Geographic Response Areas (GRA) or the Area Contingency Plan (ACP) where no GRA exists.

The point of OSPR's OSRO application process is to ensure that OSROs can perform the way that they advertise themselves. The heart of this program is the performance standards that are tested in unannounced drills and equally unannounced site visits for records review and physical inventories. The only resources to be tested and verified are those considered dedicated, or OSRO owned and controlled. Dedicated Response Resources are defined as "equipment and personnel committed solely to oil spill response, containment, and cleanup that are not used for any other activity that would adversely affect the ability of that equipment and personnel to provide oil spill response services in the timeframes for which the equipment and personnel are rated." OSROs will be rated from 0 – 60, with numbers relating to time (in hours), to get on-scene and generally mirror plan holder requirements. Ratings will be awarded in the unannounced phase of the process for specific services applied for as 0, 2, and 6 for Containment Booming; 2 and 6 for On-Water Recovery; 2 and 6 for Storage (100% dedicated resources); and Shoreline Protection is rated as yes or no.

Drill scenarios will be developed using information provided in each OSRO's application and shoreline protection criterion will be established using each OSRO's RRAW, so that performance standards will be based as much on possible on what each

OSRO says it is capable of. Drills will begin when an OSRO receives notification on the 24-hour telephone number listed in their application. All equipment and personnel will be deployed relative to the rating they are requesting and equipment and personnel must be listed in their application. Government personnel will not interfere with an OSRO's performance during a drill (e.g., no strategy testing, no coaching). It is stressed that anyone can stop a drill at any time if they have safety concerns!

The point of the drills (and the application process in general) is to verify that OSROs can deploy equipment and services within a six-hour timeframe in the geographic areas they intend to operate in using trained, qualified personnel in a safe way. OSPR sees Performance Standards and concrete measurement as the future of developing realistic plans.