

NSFCC Cascade Plan Assessment 30 Apr 2010

As a result of the Mississippi Canyon 252 spill off the Louisiana coast, the National Strike Force Coordinating Center (NSFCC) received notifications from various OSROs of the movement of response resources that may have a potential impact on vessel or facility response plan compliance to ensure the availability of response resources to respond to an average most probable, maximum most probable or a worst-case discharge. In accordance with the Oil Spill Removal Organization (OSRO) guidelines, OSROs must report any significant changes to their response resource capabilities to the NSFCC and local Coast Guard Captain of the Port (COTP) within 72 hours. Significant changes are defined in the OSRO Classification Guidelines as “a reduction in the OSRO’s classified capacity by a factor of 10% or greater, for a period of 48 hours or longer.”

NVIC 01-07 provides guidance to Coast Guard units, vessel and facility plan holders, Oil OSROs, and other members of the public in connection with spill removal resource movements after an oil spill associated with a significant pollution event. In accordance with NVIC 01-07, OSROs should review their inventory and response capability and report any significant changes to the Coast Guard as soon as possible. Every effort should be made to backfill unavailable response resources to prevent gaps in regional and national response coverage. OSROs should notify all COTPs in areas where the OSRO anticipates shortfalls in meeting plan holder coverage needs. OSROs should inform contracted plan holders of their abilities to meet planning requirements, particularly any shortfalls in ability to meet plan holder needs. The submission of cascade plans, repositioned and/or backfilled equipment to the NSFCC is highly recommended to assist with the assessment of national response coverage following a significant oil spill response. In the event that an OSRO is unable to maintain, or obtain, the required response equipment, an OSRO may develop and submit to the NSFCC, an alternative means to temporarily address plan holder response equipment needs. A copy of the submission should be provided to the COTP.

Upon receipt of an OSRO’s cascade plan or response resources assessment, the NSFCC will review the “significant changes” and evaluate the level of other OSRO resources remaining in the impacted COTP zones. The NSFCC will provide a written report detailing gaps in local COTP, regional and national response coverage to the OSRO, applicable COTP zones and USCG Headquarters.

The NSFCC has developed a cascade review process utilizing the Response Resource Inventory (RRI). The resource data from each cascade plan was entered into the RRI and assessed in terms of OSRO classification. By using an OSRO classification as a point of reference both plan holders and COTPs could evaluate plan holder coverage. If the cascade schedule was not able to achieve a comparable classification level that the OSRO holds (pre-Mississippi Canyon), deficiencies in resource capability and/or response time could be quantified, an assessment of risk associated with the deficiency in capability could be made, and the identification and the positioning or repositioning of a resource to fill the identified gap could be made (i.e. government owned resource). ***Please note that using this analysis procedure does not impact the OSRO’s official classification; no OSRO has received a new classification from the NSFCC as a result of this analysis.***

This method of analysis has been used to help quantify the potential gaps in resource capability and response times pertaining to FRP and VRP planning standards.

MSRC and NRC provided detailed cascade schedules to the NSFCC for each of the COTP zones where significant resources were temporarily removed due to the Deepwater Horizon response. NRC provided cascade plans for COTP zones Houston/Galveston, Morgan City, New Orleans, and Mobile. MSRC provided cascade plans for COTP zones Houston/Galveston, New Orleans, Mobile, Miami, and St. Petersburg/Tampa. The cascade schedules included detailed listing of resources that could be cascaded into a region in order to provide coverage for their plan holder customers. The cascade plans included a listing of available contracted and owned resources, the capability of the resource, and the response times that the resource could be mobilized to the COTP.

The cascade plan provided by MSRC indicates that they have the ability to provide coverage to their plan holder customers (both facility and vessel) for MMPD and WCD, through the cascading of available owned and contracted resources. It appears reasonable at this time for the Coast Guard to continue to find MSRC plan holder customers in compliance with WCD and MMPD planning requirements, based upon the interpretation and assessment of MSRC's cascade plan. In addition, the OSRO resources still remain within the greater Gulf of Mexico and the Coast Guard has the authority to direct/redirect resources in the event of another spill, per 33 USC § 1321(c)(1)(B). See Table Below.

The cascade plan provided by NRC indicates that they have the ability to provide coverage to their plan holder customers (both facility and vessel) for MMPD and WCD, through the cascading of available owned and contracted resources. It appears reasonable at this time for the Coast Guard to continue to find NRC plan holder customers in compliance with WCD and MMPD planning requirements, based upon the interpretation and assessment of NRC's cascade plan. In addition, the OSRO resources still remain within the greater Gulf of Mexico and the Coast Guard has the authority to direct/redirect resources in the event of another spill, per 33 USC § 1321(c)(1)(B). See Table Below.

COTP Zone	MSRC	NRC
Miami	Sufficient coverage specified in cascade plan	Sufficient coverage specified in cascade plan
New Orleans	Sufficient coverage specified in cascade plan	Sufficient coverage specified in cascade plan
Houston/Galveston	Sufficient coverage specified in cascade plan	Sufficient coverage specified in cascade plan
Mobile	Sufficient coverage specified in cascade plan	Sufficient coverage specified in cascade plan
Saint Petersburg/ Tampa	Sufficient coverage specified in cascade plan	N/A

AMPD Coverage

AMPD resource coverage gaps were not assessed by the NSFCC, as the OSRO program does not address AMPD classifications. For vessels and facilities, as opposed to the required WCD or MMPD coverages, AMPD coverage is normally arranged for just prior to when a cargo transfer is taking place. For vessels, the regulations allow for the switching of an AMPD provider on a case-by-case basis without formal notification to the Coast Guard (33 CFR § 155.1070(c)(5)). For facilities, a formal COTP notification and response plan amendment is required when changing AMPD providers. When routine AMPD response resources are moved in response to a significant spill event, it is anticipated that plan holders identify and ensure by contract or other approved means, alternate AMPD resource providers (NVIC 01-07). If individual COTPs are concerned with potential gaps in AMPD coverage, they should engage the plan holders in their AOR to ensure that plan holders have identified alternate resource providers. COTPs may also consider requests for temporary exemptions from equipment and response time requirements as authorized by 33 CFR § 154.108 and §155.130, provided proposed amendments were submitted in writing as described in NVIC 01-07 (5.a.iii).

The following is current as of April 30, 2010. If additional OSRO resources have been deployed following this notification then vessel and facility owners are advised to contact their OSRO to update the cascade plan and submit to the NSFCC for an updated assessment. NSFCC POC: ENS Allen (252) 331-6000 Ext. 3036

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