

**BUREAU OF SAFETY & ENVIRONMENTAL ENFORCEMENT (BSEE):  
OIL SPILL PREPAREDNESS DIVISION (OSPD)**

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# SOME OF WHAT WE DO:



## Oil Spill Preparedness Analysts



Review Oil Spill Response Plans



Support the National Response System



Audit Industry Spill Training and Exercises



Conduct Government Initiated Unannounced Exercises



Inspect Response Equipment

# OSRP: GENERAL COMPONENTS



**Emergency Contact Procedures**



**Response Strategies & Worst Case Discharge Scenarios**



**List of Facilities**



**Equipment Inventories & Contracts**



**Exercise & Training Programs**

# REGULATORY AUTHORITY FOR RENEWABLE ENERGY OSRPS:



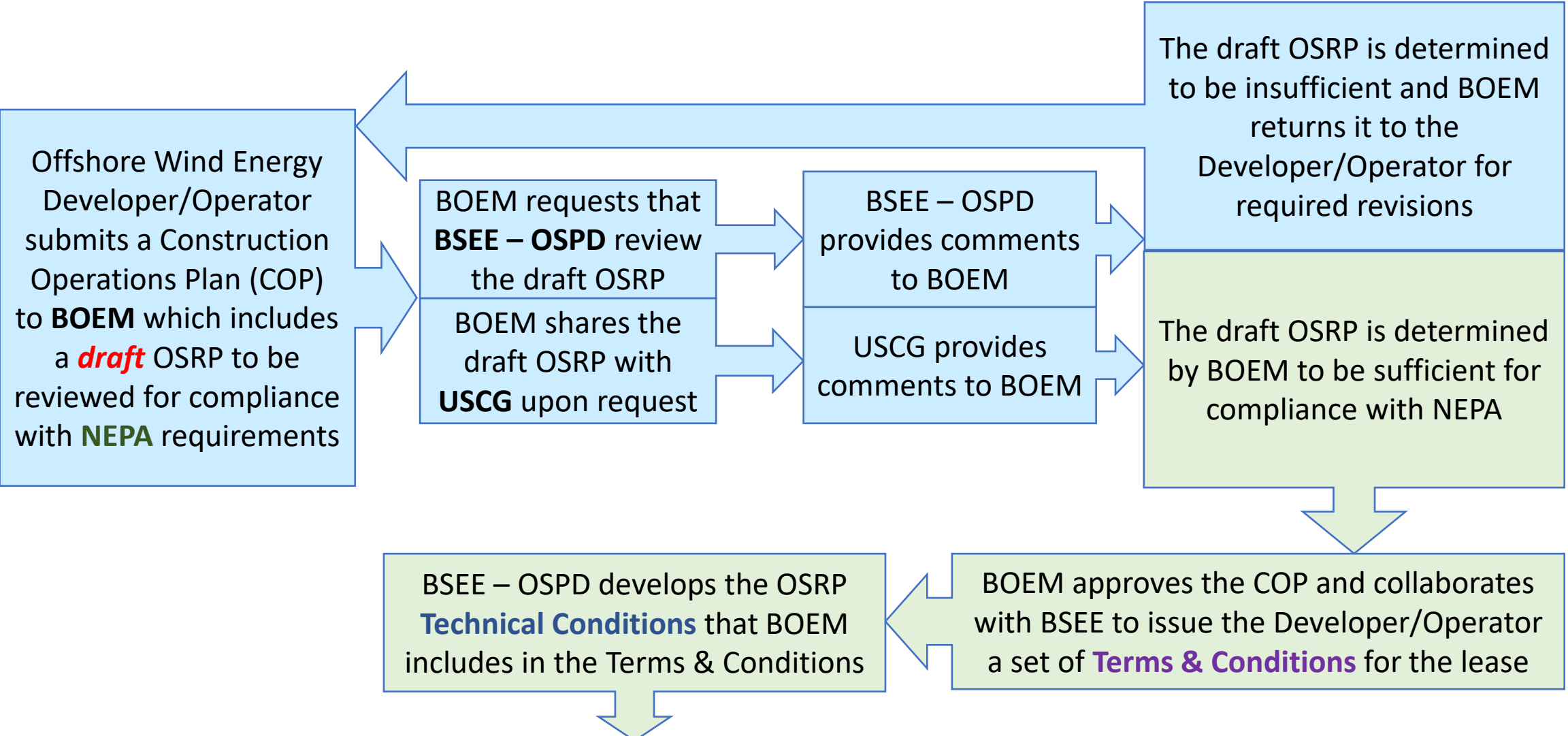
**30 C.F.R. § 585.627** - What information and certifications must I submit with my Construction Operations Plan (COP) to assist the BOEM in complying with NEPA and other relevant laws?

**(c)** You must submit your **oil spill response plan**, as required by **30 C.F.R. § 254**.





# OSRP REVIEW FOR NEPA COMPLIANCE:





# OSRP TECHNICAL CONDITIONS:

## **Oil Spill Response Plan (Planning).**

- Pursuant to 30 C.F.R. § 585.627(c), the Lessee must submit an OSRP to BSEE – OSPD in compliance with 33 U.S.C. § 1321, including information identified in 30 C.F.R. part 254 that is applicable to the Lessee’s activities.
- The OSRP may be lease specific or a regional OSRP covering multiple leases.
- The leases covered in the Regional OSRP must have the same owner or operator and must be located in the same OCS Region. The Lessee may group leases for the purposes of conducting a trajectory analysis and determining worst case discharge scenarios, subject to the approval of BSEE.



# TECHNICAL CONDITIONS (CONTINUED...)

## **The Lessee's OSRP must:**

- The OSRP must be consistent with the National Contingency Plan (NCP), the applicable Regional Contingency Plan (RCP), and appropriate Area Contingency Plan(s).
  - BSEE - OSPD will contact the USCG Atlantic Area Contingency Planning office and the applicable USCG District office in accordance with the BSEE/USCG MOA OSC-03 to have the appropriate USCG Sector personnel review the OSRP for ACP consistency.

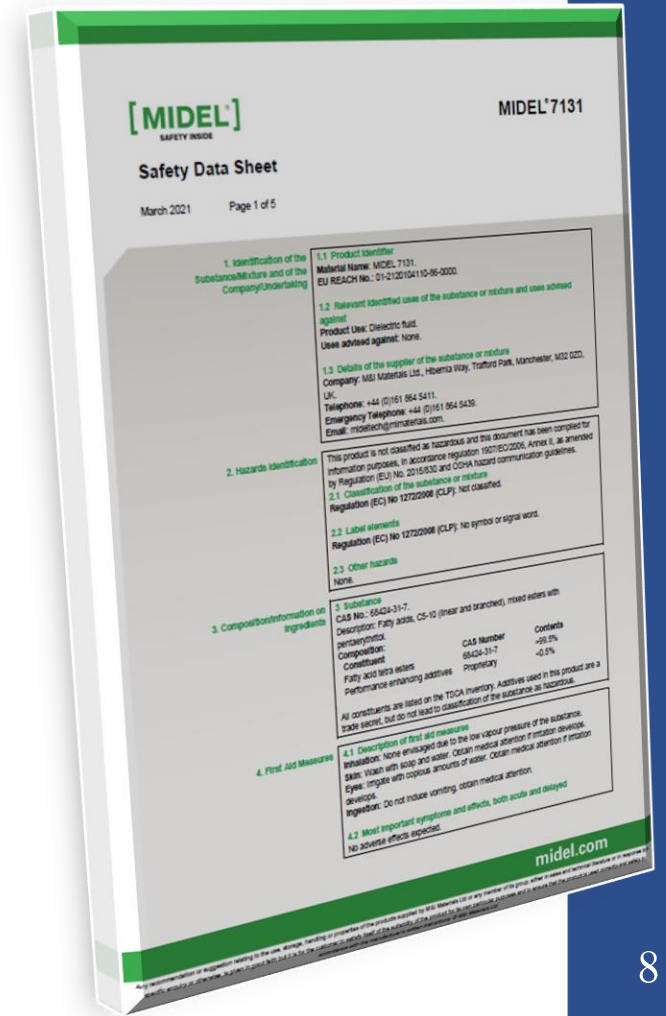
*(Note: Additional details about the OSRP review for ACP consistency will be provided on a separate slide in this presentation.)*



# TECHNICAL CONDITIONS (CONTINUED...)

## The Lessee's OSRP must:

- Describe the **type and amounts of oil** on the facilities covered in the OSRP.
- Include **safety data sheets (SDS)** for any oils present on any facility in quantities equal to or greater than 100 gallons.







# TECHNICAL CONDITIONS (CONTINUED...)

## The Lessee's OSRP must:

Include the **worst-case discharge (WCD)** volume for each type of facility covered in the plan.

- The WCD volume is the highest cumulative volume of oil contained on a single facility.

WTG	
Oil or Hazardous Substance	Quantity (gallons)
Grease Optipit Castrol	11
Grease Mobilith 007	66
Grease Shell Rohodina BBZ0	42
Gear Oil Castrol Optigear Synthetic X320	63
Hydraulic Oil Castrol Hyspin AWH-M32	79
Hydraulic Oil Castrol Hyspin AWH-M32	63
Ester Oil Midel 7131	1,611
<b>Total Volume</b>	<b>1,935</b>

OSS	
Oil or Hazardous Substance	Quantity (gallons)
Transformer Oil	79,252
Diesel Fuel	52,834
Hydraulic Oil	317
<b>Total Volume</b>	<b>132,403</b>



## TECHNICAL CONDITIONS (CONTINUED...)

### The Lessee's OSRP must:

Identify a trained **Qualified Individual (QI)** and an alternate who have full authority to implement removal actions and ensure immediate notifications of appropriate government officials and response personnel.

- Provide these individuals' 24-hour contact information, including phone numbers and e-mail addresses.

OSRPs that cover the OSS(s) must identify a trained **Incident Management Team (IMT)** and provide 24-hour contact information for each member, including phone numbers and e-mail addresses.

- If a contract has been established with an IMT, evidence of such a contract must be provided in the OSRP.



# TECHNICAL CONDITIONS (CONTINUED...)

## The Lessee's OSRP must:

Describe the procedures for internal and external spill notifications.

- Notification procedures must include the 24-hour contact information for:
  - Federal, state, and local regulatory agencies that must be notified when a spill occurs, including but not limited to the National Response Center.
  - OSROs and SROTs that are available to respond.
  - Other response organizations and subject matter experts that the Lessee will rely on for the response.

United States Coast Guard  
National Response Center

NRC HOME CONTACT US FEATURED LINKS

[Skip Navigation](#)

*Welcome to the National Response Center*

Anyone witnessing an oil spill, chemical release or maritime security incident should call the NRC hotline at 1-800-424-8802.

NTAS  
NATIONAL TERRORISM ADVISORY SYSTEM  
NO ACTIVE ALERTS

# TECHNICAL CONDITIONS (CONTINUED...)

## The Lessee's OSRP must:

Describe the **different discharge scenarios** that could occur from the Lessee's facilities and the **mitigation procedures** by which the operator and any listed/contracted OSROs (if required) would respond to such discharges.

- The mitigation procedures must address responding to both smaller spills (with slow, low-volume leakage) and larger spills to include the largest WCD.





## TECHNICAL CONDITIONS (CONTINUED...)

### **The Lessee's OSRP covering the OSS(s) must:**

Include a stochastic spill trajectory analysis which:

- Is based on the WCD volume from the OSS that contains the highest total volume of oil(s).
  - If all the OSSs contain the same volume of oil, the trajectory analysis is based on the OSS that is closest to shore.
- Is conducted for the longest period of time that the discharged oil would reasonably be expected to persist on the water's surface or 14 calendar days, whichever is shorter.
- Identifies the probabilities for oiling on the water's surface and on shorelines, and minimum travel times for the transport of oil over the duration of the model simulation.



# TECHNICAL CONDITIONS (CONTINUED...)

## The Lessee's OSRP must:

Include a concise list of the sensitive resources that are located near the Lessee's offshore facility and could be oiled by a spill.

- In lieu of listing sensitive resources, the Lessee may provide hyperlinks to corresponding Environmental Sensitivity Index Maps and Geographic Response Strategies.





# TECHNICAL CONDITIONS (CONTINUED...)

## The Lessee's OSRP must:

Include a list of OSROs and SROTs that are available to respond to the WCD.

- If the OSRP only covers WTGs, the Lessee may provide a **Letter of Intent (LOI)** from each OSRO and SROT acknowledging that they have agreed to be listed in the Lessee's OSRP.
- If the OSRP covers the ESP(s), the Lessee is required to ensure the availability of OSRO and SROT resources through a contract or membership agreement.
  - If a contract has been established with an OSRO and SROT, evidence of such contracts or membership agreements must be provided in the OSRP.

The OSRP must also include a map that shows equipment storage sites and staging areas.



# TECHNICAL CONDITIONS (CONTINUED...)

## The Lessee's OSRP must:

Include a description of the annual QI, IMT, OSRO, and SROT trainings.

- The OSRP must provide the most recent dates of applicable trainings.
- Training records must be maintained and retained for 3 years and provided to BSEE upon request.







# TECHNICAL CONDITIONS (CONTINUED...)

## **The Lessee's OSRP must:**

Contain a triennial exercise plan for review and concurrence by BSEE.

- The Lessee must conduct an annual scenario-based notification exercise, an annual scenario-based IMT tabletop exercise, and, during the triennial exercise period, at least one functional exercise.
  - If the OSRP includes an OSRO and SROT contract, an annual deployment exercise of the Lessee's contracted response equipment and personnel is required.
- BSEE may evaluate the results of the exercises and advise the Lessee of any needed changes in response equipment, procedures, tactics, or strategies.
- BSEE may periodically initiate unannounced exercises to test the Lessee's spill preparedness and response capabilities.



## TECHNICAL CONDITIONS (CONTINUED...)

### **OSRPs that cover the ESP(s) must:**

- Include a list or a hyperlink to a list of the oil spill response equipment inventory that is available to the Lessee through OSRO contracts and identify the location of the equipment depots.

### **The Lessee must:**

Ensure that contracted response equipment is maintained in a proper operating condition.

- Further ensure that all maintenance, modification, and repair records are kept for a minimum of 3 years.
- Provide these records to BSEE upon request.
- Provide BSEE with physical access to the equipment storage depots.
- Perform functional testing of the response equipment upon BSEE's request.

BSEE may require maintenance, modifications, or repairs to response equipment or require the Lessee to remove response equipment from the OSRP if it does not operate in accordance with its intended purpose.



# TECHNICAL CONDITIONS (CONTINUED...)

## **OSRP Maintenance:**

The Lessee must review and update the entire OSRP at least once every 3 years, starting from the date the OSRP was initially accepted.

- The Lessee must send a written notification to BSEE upon completion of this review and submit any updates for concurrence.

The Lessee must revise its OSRP within 15 calendar days if:

- Their response capability is significantly reduced.
- Their WCD is significantly increased.
- They remove a contracted IMT, OSRO, or SROT.
- A significant change occurs in the applicable area contingency plan.

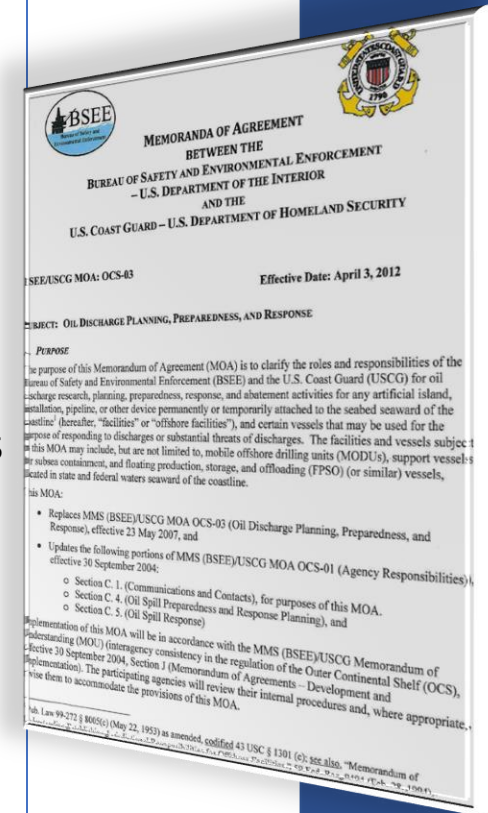
BSEE may require changes to the Lessee's OSRP if they determine that the OSRP is outdated or inadequate based on information obtained during the review process, exercises or actual spill responses, or based on other relevant information.

# OSRP REVIEW FOR ACP CONSISTENCY:



## In accordance with the BSEE/USCG MOA OCS-03:

- BSEE - OSPD will provide the USCG with access to digital copies of OSRPs and will incorporate USCG suggested revisions to the maximum extent practicable.
- The subset of OSRPs that will prompt USCG notification and review include:
  - Initial plans
  - Plans that have been revised to reflect an increase to the highest volume WCD
  - Plans that have been revised to reflect a decrease in OSRO and/or other response capabilities
  - Plans that have been revised to reflect a change in the NCP, RCP, or an ACP
- The USCG may choose to review select information in OSRPs and provide BSEE with comments on those response plans consistent with BSEE established procedures and internal review timelines.
- As determined appropriate by the OSPD Preparedness Analyst, BSEE – OSPD will communicate USCG comments to the plan submitter and request a modification of the plan prior to approval.





## OSRP REVIEW FOR ACP CONSISTENCY (CONTINUED...):

### **To be consistent with the NCP an OSRP must:**

- Demonstrate an operator's clear understanding of the Federal response structure:
  - The plan must contain procedures to notify the National Response Center and set forth the relationship between the role of the operator's response organization and the role of the FOSC.
- Establish provisions to ensure safety at the response site.
- Identify the procedures to obtain any required Federal and State permissions for using alternative response strategies.

### **At a minimum, to be consistent with the applicable ACP and RCP, the plan must:**

- Address the removal of a WCD and the mitigation of a substantial threat of a WCD.
- Identify environmentally and economically sensitive areas.
- Describe the responsibilities of the operator and of Federal, State, and Local agencies in removing a discharge and in mitigating or preventing a substantial threat of a discharge.
- Establish the procedures for obtaining an expedited decision on use of alternative response strategies.



## OSRP REVIEW FOR ACP CONSISTENCY (CONTINUED...):

### Questions to be considered:

- Does the OSRP reference the correct RCP(s) and ACP(s)?
- Are the response strategies in alignment with those permitted in the applicable RCP and ACP(s)?
- Are the alternative response technology authorization procedures listed and is a link provided to the most recent applicable preauthorization procedures in the applicable RCP(s) and ACP(s)?
- Are the decanting procedures consistent with the guidance in the applicable RCP(s) or ACP(s)?
- Does the OSRP identify critical and sensitive resource information in the WCD scenario(s) and the Resources at Risk section?
- Does the WCD scenario(s) in the OSRP trigger an update to the planning scenarios listed in the applicable ACP(s)?



## PROPOSED ACTION ITEMS FOR CONSIDERATION:

**Identify any unique pollution response challenges potentially imposed by an unlikely but nonzero threat of a colorless and odorless dielectric oil discharge in the marine and estuarine environments within your AOR:**

- Consider the relevant contents of your RCP that are to be consulted when responding to such an event and determine where that information may or may not sufficiently address the unique pollution response challenges you've identified.
- Where any preparedness gaps are discovered, revise and/or update the relevant contents of your RCP accordingly.





# QUESTIONS?



BSEE Website:  
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