



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

APR 28 2011

JMT Environmental
P.O. Box 22044
Lehigh Valley, PA 18002-2044

RE: OSRO roles and responsibilities during Government Initiated Unannounced Exercises

Dear Sir or Madame:

The United States Environmental Protection Agency (EPA) has identified you as an Oil Spill Removal Organization (OSRO) for facilities located within and subject to jurisdiction by Region III. Your company is currently under contract with a facility (or facilities) subject to the Facility Response Plan (FRP) Regulations, found in 40 CFR § 112. The purpose of this letter is to provide you with EPA's expectations for OSROs on behalf of regulated facilities during a Government Initiated Unannounced Exercise (GIUE).

As you may be aware, the objective of the GIUE is to evaluate a facility's response capability by testing notification procedures, equipment deployment, and other actions associated with a response to an oil spill scenario. Typically, the exercise scenario consists of a 2,100 gallon oil discharge outside secondary containment and into navigable waters or adjoining shorelines. The duration of the exercise is limited to a maximum of four (4) hours. The facility must deploy the equipment identified in the FRP and initiate an immediate and effective response during the four (4) hour exercise window.

When a regulated facility depends on an OSRO for emergency response, EPA expects the OSRO, on behalf of the facility, to be able to:

- Provide up to 1,000 feet of containment boom (as appropriate) and a means of deploying it within 1 hour of the discovery of the discharge¹;
- Have oil recovery devices with an effective daily recovery capacity equal to the amount of oil discharged in a small discharge or greater available at the site within two hours of the detection of the discharge;
- Demonstrate the availability of adequate storage capacity for recovered oil; and
- Properly conduct the exercise with skilled and competent responders and readily deployed response equipment.

If an OSRO fails to properly conduct the exercise on behalf of the facility they may be representing, the facility may be subject to civil penalties.

The enclosed tri-fold provides additional information regarding EPA's expectations of facilities and their OSROs during a GIUE. The OSROs should also be familiar with 40 CFR §

¹ The discharge occurs at the time the facility receives the spill scenario.

112 and the "National Preparedness for Response Exercise Program (PREP) Guidelines" (USDOT, USDOJ, USEPA; August 2002).

In the future, EPA will be holding information sessions regarding OSRO responsibilities, requirements, and actions to be taken during a GIUE. If you are interested in attending one of these sessions, or have any questions regarding your responsibilities during a GIUE, please contact Linda Ziegler-Rice, Facility Response Plan Coordinator, at (215) 814-3277.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen Melvin". The signature is fluid and cursive, with the first name "Karen" and last name "Melvin" clearly distinguishable.

Karen Melvin, Associate Division Director
Office of Enforcement
Hazardous Site Cleanup Division

Enclosure