NRC COVERED VESSELS

WASHINGTON STATE CONTINGENCY PLAN

APPROVED FEBRUARY 22, 2023

CURRENT EXPIRATION FEBRUARY 22, 2028

Washington State
Department of Ecology
Spill Prevention, Preparedness, and Response Program
P.O. Box 47600, Olympia, WA 98504-7600
Office Phone: (360) 407-7455
Fax: (360) 407-7288 or toll free 1-800-664-9184

Binding Agreement for WAC 173-182 and WAC 173-186

WAC 173-182-220 and WAC 173-186-210 require that each plan contain a written statement binding the contingency plan holder to its use. The binding agreement shall be signed by:

a) An authorized representative(s) of a nonprofit corporation established to provide oil spill contingency plan coverage;
b) An authorized owner, or operator, or a designee with authority to bind the owners and operators of the facilities or vessels covered by the plan;
c) An authorized resident agent of the vessel(s) submitting the plan;
d) An authorized representative(s) of a company contracted to the vessel or facility and approved by ecology to provide containment and clean-up services.

WAC 173-182-142 and WAC 173-186-140 classify the permanent loss of personnel designated as the binding agreement signatory as a significant change to the plan and require notification to Ecology within 24 hours.

Submitting Party Information

Company Name: NRC/NRCES	
Contact Name: Vince Scheerer	
Signing Authority as Described Above (A, B, C, or D): D	
Address: 9520 10th Ave South, Suite 150, Seattle, WA 98108	
Phone Number: 206-730-3993	Fax Number: 206-607-3001
Email: vscheerer@republicservices.com	Website: www.nrcc.com

Additional Submitting Party Information (If Needed)

Company Name:	
Contact Name:	
Signing Authority as Described Above (A, B, C, or D):	
Address:	
Phone Number:	Fax Number:
Email:	Website:

To request ADA accommodation including materials in a format for the visually impaired, call Ecology at 360-407-6831 or visit https://ecology.wa.gov/accessibility. People with impaired hearing may call Washington Relay Service at 711. People with speech disability may call TTY at 877-833-6341.

Binding Agreement

I certify that I have reviewed and am familiar with the information submitted in this Plan and that the information in the contingency plan is accurate. I am authorized to submit the plan and commit to:

a) A safe and immediate response to spills and to substantial threats of spills that occur in, or could impact Washington waters or Washington's natural, cultural and economic resources;

b) Having an incident commander in the state within six hours after notification of a spill;

c) Implementation and use of the plan during a spill and substantial threat of a spill, and to the training of personnel to implement the plan;

d) Making necessary and appropriate expenditures in order to implement plan provisions; and

e) Working in unified command within the incident command system to ensure that all personnel and equipment resources necessary to the response will be called out to clean up the spill safely and to the maximum extent practicable.

	2/14/2024
Authorized Signature	Date
Vince Scheerer	
Print Name	
Vice President	
Title	
Authorized Signature	Date
Print Name	
Title	

Oil Spill Contingency Plan Approval Certificate

DEPARTMENT OF ECOLOGY
State of Washington

The Oil Spill Contingency Plan for

NRC/NRCES

has been APPROVED pursuant to
Chapter 173-182 Washington Administrative Code
by the

WASHINGTON STATE
DEPARTMENT OF ECOLOGY
Spill Prevention, Preparedness, and Response Program
Spill Preparedness Section

February 22, 2023
Date of Approval

Matt Bissell
Preparedness Section Manager

February 22, 2028
Plan Expiration Date

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
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November 27, 2017

Stephanie Barton
Director, Emergency Response Programs
NRC/NRCES
9520 10th Ave. S, Suite 150
Seattle, WA 98108

Dear Ms. Barton:

Congratulations. On behalf of the state of Washington I am granting final approval to the NRC/NRCES oil spill contingency plan. Thank you for completing the aerial surveillance phase-in requirements under WAC 173-182-321(3) and your annual update. The plan meets Washington's statutory and regulatory requirements and must be maintained in an accurate condition. Please add a copy of the enclosed certificate to the front of each plan as proof of compliance. This approval expires on November 27, 2022.

Thank you for your cooperation. If you have questions, please contact your plan compliance specialist, Erica Bates at (360) 407-6956 or at erica.bates@ecy.wa.gov.

Sincerely,

Linda Pilkey-Jarvis
Preparedness Section Manager
Spill Prevention, Preparedness, and Response Program

Enclosure: Plan Approval Certificate

cc: Timothy S. Lupher, USCG Sector Puget Sound
USCG Sector Columbia River
D13 USCG
HQ Spills Central Files, Preparedness, NRC

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May 8, 2020

Stephanie Barton
NRC/NRCES
9520 10th Ave S
Suite 150
Seattle, WA 98108

Dear Stephanie Barton:

We have reviewed and approved the annual update to the NRC oil spill contingency plan received May 5, 2020. The updates to your plan include the following:

- Updated personnel in ICS roster, Chapter 2
- Updated personnel in ICS roster, Chapter 3

These updates are added to the paper and electronic copies of your oil spill contingency plan at Ecology. Thank you for keeping your plan updated with the most current information. If you have any questions regarding your oil spill contingency plan, please contact me at (360) 790-3273 or at kaitlin.lebon@ecy.wa.gov. As always, we appreciate your partnership in protecting Washington's environment.

Sincerely,

Kaitlin Lebon
Oil Spill Preparedness Planner
Spill Prevention, Preparedness, and Response Program

cc: Timothy Lupher, USCG Sector Puget Sound
USCG Sector Columbia River
HQ Spills Central Files, Preparedness, NRC/NRCES

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December 17, 2020

Stephanie Barton
NRC/NRCES
9520 10th Ave S, Suite 150
Seattle, WA 98108

Dear Stephanie Barton:

We have reviewed and approved the annual update to the NRC oil spill contingency plan sent December 8, 2020. Revisions included:

- Updated vessel placard to include a form to document notifications, updated phone numbers.

Thank you for these updates. The revisions are included in the digital copy of your plan residing at Ecology. If you have any questions regarding your oil spill contingency plan, please contact me at (360) 790-3273 or at kaitlin.lebon@ecy.wa.gov. We appreciate your partnership in protecting Washington State's environment.

Sincerely,

Kaitlin Lebon
Oil Spill Preparedness Planner
Spill Prevention, Preparedness, and Response Program

cc: Timothy Lupher, USCG Sector Puget Sound
USCG Sector Columbia River
HQ Spills Central Files, Preparedness, NRCES

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August 13, 2019

Stephanie Barton
NRCES
9520 10th Ave S
Seattle, WA 98108

Dear Stephanie Barton:

Thank you for conducting your deployment drill on May 22 and 23, 2019, in the Strait of Juan de Fuca. Drill credit is noted on the enclosed drill tracking matrix. Shaded areas on the matrix indicate components and sub-components for which you have received credit. The matrix is used to track your progress over a three-year period.

The CANUSPAC drill was a successful demonstration of the following drill objectives:

- Mobilize an international task force to identify, contain, recover, and store mobile oil in unsheltered waters between Port Angeles and Victoria, within the legal framework of the CANUSPAC.
- Test of tactical communication plans and safety plans across all response partners.
- Test of the CANUSPAC transboundary response equipment mobilization processes for mobilization of both overland and overwater equipment.
- Facilitate a multi-agency observer program for on-water activities and expand regional understanding of transboundary response capabilities, challenges, and opportunities for improvements.

Ecology appreciates your commitment to oil spill response readiness. Your efforts play an important role in protecting Washington's marine environment. If you have any questions about this drill evaluation, please contact me at Kelly.Kiyohara@ecy.wa.gov or (360) 407-7514.

Sincerely,

Kelly Kiyohara
Oil Spill Drill Coordinator
Spill Prevention, Preparedness, and Response Program

Enclosures: Drill Matrix and Evaluation

cc: Tiffany Gallo, NRCES
Tim Lupher, USCG Sector Puget Sound
Spills HQ Central Files, Preparedness, NRCES

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May 1, 2020

Stephanie Barton
NRCES
9520 10th Ave S, Suite 150
Seattle, WA 98108

Dear Stephanie Barton:

Thank you for conducting your worst case drill on November 20, 2019, at the Swinomish Casino and Lodge in Anacortes, WA. Drill credit is noted on the enclosed drill tracking matrix. Shaded areas on the matrix indicate components and sub-components for which you have received credit. The matrix is used to track your progress over a three-year period. My apologies about the long delay in sending you this evaluation. Both the completion of the rules and the events with the COVID-19 response have been all-consuming for the Spills Program.

This drill was a good test of the NRCES plan. NRCES brought together a diverse group of stakeholders to integrate into their team, including the U.S. Coast Guard, Washington State Department of Ecology and Fish and Wildlife, National Oceanic and Atmospheric Administration, San Juan County, Focus Wildlife, Vane Brothers, NJR, and GenWest. We appreciate the cooperation in bringing together such a diverse group and integrating trustee agencies into the response to work under a Unified Command.

Ecology appreciates your commitment to oil spill response readiness. Your efforts play an important role in protecting Washington's marine environment. If you have any questions about this drill evaluation, please contact me at kelly.kiyohara@ecy.wa.gov or (360) 764-6222.

Sincerely,

Kelly Kiyohara
Drill Coordinator
Spill Prevention, Preparedness, and Response Program

Enclosures: Drill Matrix
Evaluation Checklist

cc: Tiffany Gallo, NRCES
Timothy S. Lupher, USCG Sector Puget Sound
Spills HQ Central Files, Preparedness, NRCES

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October 20, 2020

Stephanie Barton
NRCES
9520 10th Ave. S
Seattle, WA 98108

Dear Stephanie Barton:

Thank you for conducting a deployment drill on 7/23/2020 at the Cultas Bay location. This drill has been *self-certified* based on the documentation you provided. Drill credits is noted on the enclosed drill-tracking matrix. Shaded areas on the matrix indicate credit. The matrix is used to track your progress over a three-year period.

Your team successfully demonstrated the installation of GRP AI-28. You were able to perform reactive actions to develop health and safety protocols and conduct a valid assessment. Please remember to act on any lessons learned from this drill.

Ecology appreciates your commitment to oil spill response readiness. Your efforts play an important role in protecting Washington's marine environment. If you have any questions about this drill evaluation, please contact me at howard.zorzi@ecy.wa.gov or (425) 736-3467.

Sincerely,

Howard Zorzi
Oil Spill Drill Specialist
Spill Prevention, Preparedness, and Response Program

Enclosures: Drill Matrix

cc: Tiffany Gallo, NRCES
Timothy S. Lupher, USCG Sector Puget Sound
Spills HQ Central Files, Preparedness, NRC/NRCES

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November 13, 2020

Stephanie Barton
NRCES
9520 10th Ave S
Seattle, WA 98108

Dear Stephanie Barton:

Thank you for conducting a deployment drill on 8/20/2020 in Elliott Bay. This drill has been *self-certified* based on the documentation you provided. Drill credit is noted on the enclosed drill tracking matrix. Shaded areas on the matrix indicate credit. The matrix is used to track your progress over a three-year period.

Your team responded ably to scenario of a large spill of diesel from Terminal 15 by mobilizing the right number of personnel, assessing site safety, and deploying on-water recovery equipment. Please remember to act on any lessons learned from this drill.

Ecology appreciates your commitment to oil spill response readiness. Your efforts play an important role in protecting Washington's marine environment. If you have any questions about this drill evaluation, please contact me at max.gordon@ecy.wa.gov or (360) 972-4890.

Sincerely,

Max Gordon
Oil Spill Preparedness Planner
Spill Prevention, Preparedness, and Response Program

Enclosures: Drill Matrix

cc: Tiffany Gallo, NRCES
Timothy S. Lupher, USCG Sector Puget Sound
Spills HQ Central Files, Preparedness, NRCES

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October 15, 2021

Stephanie Barton
NRCES
9520 10th Ave S
Seattle, WA 98108

Dear Stephanie Barton:

Thank you for conducting a deployment drill on July 27, 2021, at the Woodard Bay Conservation Area. Drill credit is noted on the enclosed drill tracking matrix. Shaded areas on the matrix indicate components and sub-components for which you have received credit. The matrix is used to track your progress over a three-year period.

This drill was a good demonstration of NRCES' ability to respond to a spill that could impact the Puget Sound. NRCES personnel conducted a thorough on-water initial site assessment, demonstrated clear communication, and deployed GRP protection strategy SPS-43. The strategy was modified based on environmental conditions and would be effective in the event of an actual spill.

Special thanks needs to be given to NRCES for the extra effort they put into the planning and completion of this drill. NRCES recognized a gap in deployment history with GRPs in the South Sound and suggested this sensitive area as a location for the drill. The strategy deployed was designed to protect the sensitive and complex mouth of Woodard Creek/estuary of Woodard Bay, South Sound. The team worked with Washington Department of Natural Resources (DNR) to gain access to the conservation area, to use it as a staging area and command post. They also utilized a drone to assess the potentially impacted areas and assisted responders in deploying the GRP.

And finally, Ecology would like to thank NRCES for allowing a large group of observers, made up of Ecology and DNR employees, to observe the drill, and for taking the time to educate the group in the activities of the day as well as overall oil spill response actions. Quite an impressive day. Many thanks and kudos to the team!

Ecology appreciates your commitment to oil spill response readiness. Your efforts play an important role in protecting Washington's marine environment. If you have any questions about this drill evaluation, please contact me at shawn.zaniewski@ecy.wa.gov or (360) 951-1668.

Sincerely,

Shawn Zaniewski
Oil Spill Drill Specialist
Spill Prevention, Preparedness, and Response Program

Enclosures: Drill Matrix and Evaluation

cc: Tiffany Gallo, NRCES
Timothy S. Lupher, USCG Sector Puget Sound
Spills HQ Central Files, Preparedness, NRCES

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November 19, 2021

Stephanie Barton
NRC/NRCES
9520 10th Ave S, Ste 150
Seattle, WA 98108

Dear Stephanie Barton:

Congratulations. After our review of your plan updates required by the phase-in periods for the 12-month and 18-month requirements of the updated WAC 173-182, we are granting final approval to the NRC/NRCES oil spill contingency plan. The plan meets Washington's statutory and regulatory requirements and must be maintained in an accurate condition. Please add a copy of the enclosed certificate to the front of the plan as proof of compliance. This approval expires on November 27, 2022.

While the below edits are not required at this time, we encourage you to make these changes to your plan during your next plan update:

- Page 5-5 – replace "Company Name" with NRC.
- See list of suggested Wildlife Response edits received from WDFW during your public comment period (attached).

Thank you for your commitment to improving your plan during this rule implementation period. If you have questions, please contact your Oil Spill Preparedness Planner, Kaitlin Lebon, at (360) 790-3273 or at kaitlin.lebon@ecy.wa.gov.

You have a right to appeal this Order to the Pollution Control Hearing Board (PCHB) within 30 days after the date of receipt of this Order. The appeal process is governed by Chapter 43.21B RCW and Chapter 37108 WAC. "Date of receipt" is defined in RCW 43.21B.001(2).

To appeal you must do the following within 30 days of the date of receipt of this Order:

- File your appeal and a copy of this Order with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this Order to Ecology in paper form - by mail or in person. (See addresses below.) Email is not accepted.

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December 27, 2021

Stephanie Barton
NRC/NRCES
9520 10th Ave S, Ste 150
Seattle, WA 98108

Dear Stephanie Barton:

Thank you for conducting a tabletop drill on December 2, 2021, near Boston Harbor. Drill credit is noted on the enclosed drill tracking matrix. Shaded areas on the matrix indicate components and sub-components for which you have received credit. The matrix is used to track your progress over a three-year period.

This was a strong demonstration of the NRC plan. NRCES/US Ecology personnel are experienced responders and are well trained on the plan and the ICS process. Well done! The Unified Command was a strong group of decision makers. The NRCES team worked smoothly through the drill scenario and the process, and seem to be prepared for the worst case drill next year.

Ecology appreciates your commitment to oil spill response readiness. Your efforts play an important role in protecting Washington's marine environment. If you have any questions about this drill evaluation, please contact me at max.gordon@ecy.wa.gov or (360) 972-4890.

Sincerely,

Max Gordon
Oil Spill Preparedness Planner
Spill Prevention, Preparedness, and Response Program

Enclosures: Drill Matrix and Evaluation

cc: Tiffany Gallo, NRCES
Timothy S. Lupher, USCG Sector Puget Sound
USCG Sector Columbia River
Spills HQ Central Files, Preparedness, NRCES

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600, Olympia, WA 98504-7600 • 360-407-6000

June 1, 2022

Stephanie Barton
NRC/NRCES
9520 10th Ave S, Ste 150
Seattle, WA 98108

Dear Stephanie Barton:

Thank you for conducting a deployment drill on April 12, 2022, at the Kinder Morgan Harbor Island Terminal. Drill credit is noted on the enclosed drill tracking matrix. Shaded areas on the matrix indicate components and sub-components for which you have received credit. The matrix is used to track your progress over a three-year period.

This drill was an effective demonstration of your contingency plan. Responders mobilized quickly and safely and communicated well. Ecology also applauds NRC for taking on the added difficulty of participating in a joint plan holder deployment drill with Kinder Morgan. Both companies worked well together to achieve all planned credit items. Additionally, taking on the first deployment of CPS-40 is greatly appreciated. As well the initiative to invite representatives from the Seattle Aquarium and the Port Gamble S'klallam Tribe, and to notify the public and press about on-water activity during the deployment.

Ecology appreciates your commitment to oil spill response readiness. Your efforts play an important role in protecting Washington's marine environment. If you have any questions about this drill evaluation, please contact me at stephen.nishikawa@ecy.wa.gov or (360) 789-0868.

Sincerely,

Stephen Nishikawa
Oil Spill Drill Specialist
Spill Prevention, Preparedness, and Response Program

Enclosures: Drill Matrix and Evaluation

cc: Tiffany Gallo, NRCES
Timothy S. Lupher, USCG Sector Puget Sound
Spills HQ Central Files, Preparedness, NRCES

PLAN DISTRIBUTION

An electronic copy of the NRC Plan is posted on the NRC Plan webpage on the NRC website (www.nrcc.com) providing immediate access to Covered Vessel owners, agents and demise charterers, Qualified Individuals and consultants, all stakeholders, and the general public to the Plan. A hard copy of the approved NRC Plan is also provided to Ecology.

Cross-Reference to Ecology Plan Requirements
(per WAC Cross Reference — 173-182 WAC)

Item	Section/Figure
SECTION A – General Planning, Information and Timing	
Plan Maintenance and reporting obligations (WAC 173-182-140, 142, 245, 150)	
1. Plan review and update procedures: • Annual review – update and distribute amended pages to ecology, or send letter confirming existing plan is accurate. • Notify Ecology of significant changes 2. Post spill review and documentation: • Conduct post spill review procedures to confirm effectiveness of plan and make plan improvements	1.14
SECTION B – Contingency Plan Format and Content	
Contingency plan format requirements (WAC 173-182-210)	
1. Formatted for maximum usefulness during a spill (includes job aids, diagrams, checklists)	X
2. Formatted with chapters, sections and annexes/appendices. Includes detailed TOC based on chapter, section, annex and titles, tables and figures.	X
3. Format allows replacement of revised pages.	X
Binding Agreement Statement (WAC 173-182-220)	
1. Name, address, phone number, email and website of submitting party 2. Verification of commitment to immediate response to spills. 3. Commit to having an Incident Commander in the state within 6 hours after notification of a spill. 4. Commit to implementation and use of plan during a spill and to training of personnel to implement plan. 5. Verify authority and capability of plan holder to make necessary and appropriate expenditures to implement plan provisions. 6. Commit to working in unified command within the incident command system.	0-3
Contingency Plan General Content (WAC 173-182-230)	
Plan refers to and is consistent with the NWACP	1.2, throughout
States federal and state requirements intended to be met by plan.	1.7
Plan states size of worst case spill. For vessel umbrella plans – a worst case volume for each port of operation may be submitted to ecology (if operations of enrolled vessels differ by port)	1.4
Revision Log to record revisions and updates (identify section amended, date of amendment, verification that ecology notified, person making change).	0-26

Item	Section/Figure
Cross reference table reflecting locations in the plan of each component required.	Cross reference
Name, phone number, address, 24-hour contact number of PRC • Copy of mutual aid agreements and description of terms of that document. • Specify in writing if plan holder relies on a PRC or other contractor to staff ICS positions for spill management team.	App. A 3.2
Procedures to track and account for the entire volume of oil recovered and oily wastes generated and disposed of during spills.	Chapter 7
For vessels: • Name of each vessel covered under the plan • Name, address, location of the owner, • Official identification code or call sign • Country of registry • All ports of call or areas of expected operation in Washington waters • Type of oil by groups handled • Oil volume capacity by group • Description of operations covered by plan (include written, diagram indicating cargo fuel and ballast tanks and piping, power plants and other oil storage and transfer sites • Special exemption for vessel umbrella plans • Umbrella plans shall include a list of the types of vessels and the typical oil types by group and volumes • List all oils or products by name, include density, gravity, API, oil group number, sulfur content and ship capacity	1.3 1.3 1.3 Tables 1-1, 1-2
Vessel diagrams indication cargo fuel and ballast tanks	1.3
Procedures to establish a process to manage oil spill liability claims	3.2, App. C
Supplemental Resources (WAC 173-182-232)	
Umbrella plans must provide documentation that authorizes the plan holder to activate supplemental response resources.	NA
Field Document (WAC 173-182-240)	
Emergency Response Towing Vessel (ERTV) (WAC 173-182-242)	
• Covered vessels that transit the Strait of Juan de Fuca must have contracted assess to the ERTV • Plan should detail information about the ERTV's capabilities and activation • Plan must commit to participating in drills that test compliance • Procedures for call out must be included in field document	App. E

Item	Section/Figure
Initial Response Actions (WAC 173-182-250)	
Initial Spill Action Forms	4.1, Fig. 2-2
Equipment to be used to conduct initial spill assessment – including equipment effective in darkness and low visibility (e.g. visual methods, tracking buoys, trajectory modeling, aerial overflights, thermal and infrared)	4.5
Safety Assessment (including initial air monitoring) for all types of spills, including spills to groundwater	4.3
Procedures to confirm the occurrence and estimate the quantity and nature of the spill, including updated reports.	4.5
Notification and call-out procedures (WAC 173-182-260)	
Procedures to immediately notify appropriate parties • Identify central reporting office or individuals responsible for implementing the notification procedure	2.1
List name and phone numbers of required notifications to government agencies, response contractors, spill management team members (internal call down information need not be included but should be available for review)	App. C-5
Identify clear order of priority for immediate notification.	Fig. 2-1
Vessel notification requirements (WAC 173-182-262)	
Covered vessels must notify the state through the WDEM of a discharge or substantial threat of a discharge.	2.2
Maintenance records for response equipment (WAC 173-182-270)	
Response equipment maintained in a state of readiness	5.5
Schedules, methods, and procedures for equipment maintenance. (maintenance records for at least 5 years available upon request	5.5
Spill Management Teams (WAC 173-182-280)	
Personnel available to manage oil spill (including contract personnel) • Organizational diagram for spill team for worst case spill • Primary and alternate person to lead each ICS spill management position down to section chief and command staff level (made available to ecology upon request) • Written agreement with response contractors used to fill positions. • Job description for each spill management position (if consistent with NWACP may reference)	Fig 3-1

Item	Section/Figure
Type and frequency of training for each position. (ICS, NWACP policies, use and location of GRPs, contents of plan, worker health and safety). Training program to include participation in announced and unannounced exercises).	Chapter 8 Fig 3-1
Covered vessels: primary and alternate incident commander's representative that can form unified command at the initial command post. Include estimated time frames for arrival of the remainder of the spill management team to the spill site or command post.	Sec 3 5.2
List process for orderly transitions of initial response staff to incoming local, regional, and away personnel, including transitions between shift changes.	3.2
Covered vessel umbrella plans: describe transition from umbrella plan to vessel owner.	App. C-8-9
SECTION C – Planning Standards	
Planning Standards (WAC 173-182-310)	
Ecology shall apply planning standard when determining ability of plan to meet regulations (to be verified at drills/spills). RP must address entire volume of actual spill regardless of planning standards. Planning standards do not constitute cleanup standards.	
Vessel of Opportunity planning standard (WAC 173-182-317)	
Covered vessel plan holders shall have contracted access to VOO in the regions they transit or operate.	5.3
Covered vessel planning standards for aerial surveillance (WAC 173-182-321)(2)	
Plans must include logistical sources of additional resources not under contract.	5.3.2
Planning standards for Non-floating oils (173-182-324)	
Plan holders must have a contract with a PRC that maintains resources to respond to group 5 oils.	5.3.3
Planning standards for dispersants (WAC 173-182-325)	
Vessels carrying group II or III persistent oil as primary cargo in any area where pre approval or case-by-case use of dispersants is available as per NWACP must plan for use of dispersants.	5.3.4
Identify locations of dispersant stockpiles capable of dispersing the lesser of 5% of worst case spill volume or 12,000 barrels/day using dispersant to oil ratio of 1:20.	5.3.4
Describe methods of transporting equipment and supplies to a staging area, and appropriate aircraft or vessels to apply the dispersant and monitor its effectiveness.	5.3.4
Describe operational support capability including the platforms and spotters to deploy dispersants, monitor the efficacy of application and ensure safety of response personnel.	5.3.4
Planning standards for in situ burning (WAC 173-182-330)	

Item	Section/Figure
For areas where in situ burning has an expedited approval process, provide plan for the use of in situ burning.	5.3.5
Identify the locations of two fire booms, air monitoring equipment, igniters and aircraft or vessels to be used to deploy the igniters.	5.3.5
Fire booms must be 500 ft in length each and have additional 1000 ft of conventional boom, tow bridles, and work boats capable of towing the boom for burning operations.	5.3.5
Describe methods of transporting the equipment to a staging area, and appropriate aircraft or vessels to monitor its effectiveness at the scene of an oil discharge.	5.3.5
Resources capable of being on scene within 12 hours of spill awareness.	5.3.5
Planning standards for storage (WAC 173-182-335)	
Identify both on-water devices and shoreside interim storage locations. For marine waters – shoreside storage can be identified to meet fifty percent of storage requirements in the planning standard tables, if the plan holders can demonstrate that recovered oil can be transported to the shoreside storage. For freshwater – shoreside storage to meet 65% of storage requirements if plan holder demonstrates that recovered oil can be transported to the shoreside storage. Covered vessel plan holders, at least twenty-five percent of the total worst case discharge volume at twenty-four hours, from the planning standard tables, must be dedicated to on-water storage.	5.3.6, App. B
Determining effectiveness of recovery systems (WAC 173-182-345)	
Plan holders and PRCs that own equipment must provide information to WDOE to determine the effectiveness of the recovery systems and how equipment meets planning standards.	5.4 App. A & E
Determining efficiency of recovery systems in various operating environments and product types: • For skimmers: Transport and deployment, list boom and workboats associated with each water based skimming system, identify pumps and pumping capacity to be used to transfer product to storage devices. • For oil recovery systems relying on vessel of opportunity or non-dedicated transport asset, include how asset would be located and secured. Include mobilization time needed to ensure assets are available, as well as time needed to set up oil recovery system, and personnel.	5.4 App. A & E
Determining effective daily recovery capacity (WAC 173-182-348)	
Plan holders and PRCs that own recovery equipment shall request EDRC (or alternative EDRC) using procedures and criteria in WAC 173-182-348 and 33 CFR 155, Appendix B, Section 6, Determining Effective Daily Recovery Capacity for Oil Recovery Devices. For each skimming system, identify oil storage associated with each recovery system. State storage capacity integral to oil recovery system. Describe how recovered oil is to be transported to/from interim storage.	5.4 App. A & E App. A, B & E

Item	Section/Figure
Covered vessel plan holders technical manuals (WAC 173-182-349)	
Plan holders that operate or transit in the Neah Bay, Cathlamet, or San Juan Islands planning standard areas must provide a technical manual that includes all of the equipment appropriate for the operating environment that is necessary to meet the recovery and storage requirements, through the forty-eight hour time frame. Plan holders must use a systems approach to identify the equipment, including WRRL identification or other unique identification numbers, that will be used to describe the response systems in the technical manual.	5.3.7
Planning standards for plan operations (WAC 173-182-350-450)	
Provide spreadsheet on resources intended to meet planning standards. Account for boom, recovery systems, storage, and personnel by type, quantity, home base and provider. Include time for notification and mobilization of equipment and personnel (notification + mobilization + travel time = time to spill site). For dedicated resources owned by plan holder use mobilization planning factor = 30min. For all other dedicated response equipment use mobilization planning factor = 1 hour. Nondedicated resources: mobilization planning factor = 3 hours.	5.4, App. A & E
Equipment travel speeds computed using 35 mph for land and 5 kts for water.	5.2
Provide documentation (e.g. actual performance during spills or unannounced drills) to request approval for alternative notification, mobilization and travel times. Include date and time of performance or test, weather/sea state conditions and transportation information.	5.2
San Juan county planning standard (WAC 173-182-370) Padilla Bay planning standard (WAC 173-182-375) Commencement Bay – Quartermaster Harbor planning standard (WAC 173-182-380) Nisqually planning standard (WAC 173-182-385) Dungeness planning standard (WAC 173-182-390) Neah Bay Staging Area (WAC 173-182-395) Copalis, Flattery Rocks, Quillayute Needles planning standard (WAC	5.4, App. A

Item	Section/Figure
173-182-400) Grays Harbor Planning Standard (WAC 173-182-405) Willapa Planning Standard (WAC 173-182-410) Washington Coast Planning Standard (WAC 173-182-450) Transfer sites for covered vessels at facilities where transfers occur, and for facilities with a vessel terminal (WAC 173-182-355)	
SECTION D - Response and Protection Strategies for Sensitive Areas	
Requirements for response and protection strategies (WAC 173-182-510)	
Methods to track and contain spilled oil and enhance recovery and removal operations described in the plan	4.5
Describe how environmental protection will be achieved: • Protection of sensitive shoreline and island habitat by diverting or blocking oil movement • Description of sensitive areas and strategies to protect resources (including info on natural resources, coastal and aquatic habitat types and sensitivity by season, breeding sites, presence of state or federally endangered or threatened species, commercial and recreational species, geographic features, isolation areas beach types, geological characteristics * Identification of sensitive resources will not be limited to surface and shoreline species at risk from floating oil spills but will also include water column and benthic species at risk from sunken, submerged, or nonfloating oil spills. * Additional nonfloating oils considerations include identification of waterway depths, water density, sediment load, sea floor or river bottom types, and response options based on those factors. • Identify public resources (public beaches, water intakes, drinking water supplies, marinas) • Identify shellfish resources and methods to protect • Identify significant economic resources to be protected in area covered by plan • For facilities with potential to impact “sole source” aquifer/public drinking water supply identify type of substrate and geologic extent of sensitive sites	6.1 - 6.4
Refer to NWACP for GRP’s developed to meet requirements. If approved GRPs do not exist in the NWACP, work with ecology to determine alternative sensitive areas to protect.	6.4
Identify potential initial command post locations	Table 3.2
Planning standards for shoreline cleanup (WAC 173-182-522)	
Each plan shall include procedures for identifying shoreline types that could be impacted by an oil spill and procedures to determine appropriate response tactics for the potentially impacted shorelines during spills.	6.7 – 6.8

Item	Section/Figure
Plan holders must have contracted access to one hundred trained shoreline clean-up workers. The shoreline clean-up workers must have appropriate safety and Hazwoper training.	6.8
Plan holders must have contracted access to trained shoreline clean-up supervisors. Training for supervisors must include safety, Hazwoper, and relevant ICS courses. For planning purposes a ratio of 1:10 supervisors to clean-up workers should be available.	6.8 6.8
Plan holders shall have access to adequate equipment for passive recovery for three miles of shoreline on three tide lines. The plan must identify the staging location(s) of the shoreline clean-up equipment.	6.8
The plan holder must have access to a shoreline clean-up mobile storage cache that can support eighty to one hundred shoreline clean-up workers with personal protective equipment, hand tools, and other logistical support for three to five days.	6.8
Plan holders must describe how data collection, communications, data transmission and data management will be conducted.	6.8
The plan shall describe how the plan holder will obtain additional resources necessary to support fourteen additional days of shoreline cleanup. The description should include vendor names, contact information, resources, and approximate time frames for resources to arrive at a staging area.	6.8
Planning standards for air monitoring (WAC 173-182-535)	
Plans will include a narrative description of applicable federal, state, and local requirements and the plan holder's resources for conducting air monitoring to protect oil spill responders and the public	4.3.3
Planning standards for wildlife response (WAC 173-182-540)	
Plan holders must plan to respond to and care for wildlife injured or endangered by oil spills. Wildlife response actions shall be conducted in accordance with applicable federal and state regulations and the Northwest Area Contingency Plan. The Plan must: • include contact information for any PRC or WRSP, available under contract or other approvable means • describe the equipment, personnel, and resources for wildlife response, • have contracted WRSP personnel such that one person that could have arrived in state within the first twelve hours of spill notification to coordinate with state, federal, tribal, and other response partners • have contracted access to WRSP personnel to conduct and manage the various field aspects of a wildlife response such that two personnel that could have arrived within the first twelve hours of spill notification and an additional seven personnel could have arrived within twenty-four hours.	6.6
Alternative method of evaluating planning standards (WAC 173-182-620)	
Plan holder may request that ecology review and approve a plan based on alternative planning standards	5.4.2 – 5.4.3
Drill participation, scheduling and evaluation (WAC 173-182-700)	
Plan holders and primary response contractors shall participate in a drill and equipment verification program.	8.10, App. E

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ACRONYMS AND ABBREVIATIONS

Throughout the Plan, the following acronyms and abbreviations shall mean:

Covered Vessels	Vessels for which Owner, Operator, Demise Charterer or Agent has contract directly with NRC for NRC Plan coverage
DOT	Department of Transportation
Ecology	Washington State Department of Ecology
EDRC	Effective Daily Recovery Capacity
ERTV	Emergency Response Towing Vessel
FOSC	Federal On Scene Coordinator
FRV	Fast Response Vessels
GRP	Geographic Response Plan
HAZWOPER	Hazardous Waste Operations and Emergency Response
HB 1186	House Bill 1186
ICP	Incident Command Post
ICS	Incident Command System
IOC	NRC International Operations Center
IOSA	Island Oil Spill Association
NPREP	National Preparedness for Response Exercise Program
NRC	National Response Corporation and NRC Environmental Services Inc.
NRC Plan	NRC Covered Vessel Washington State Contingency Plan
NSF	National Strike Force
NWACP	Northwest Area Contingency Plan
OHMSETT	Oil and Hazardous Materials Simulated Environmental Test Tank
OPA'90	Oil Pollution Act of 1990
OSHA	Occupational Safety and Health Administration
OSRO	Oil Spill Removal/Response Organization
OSRV	Oil Spill Response Vessel
PPE	Personal Protective Equipment
PRC	Primary Response Contractor
RBS	Rotating Brush Skimmer
RP	Responsible Party
SMART	Special Monitoring of Applied Response Technologies
SOSC	State On-Scene Coordinator
SWB	Shallow Water Barge
USCG	United States Coast Guard
USFWS	U.S. Fish and Wildlife Service
VOO	Vessel of Opportunity
WAC	Washington Administrative Code
WCMRC	Western Canada Marine Response Corporation
WCS	Worst Case Spill
WEDM	Washington Emergency Management Division
WRRL	Western Response Resource List
WSFW	Washington State Fish and Wildlife

RECORD OF REVISIONS

UPDATING PROCEDURES: (see next page)

Change Number	Date of Amendment	Section Amended	Signature of Person Entering Change
Change 9	May 2024	Chapters 3, 6 Appendix C	
Change 8	March 2024	Opening Pages, Binding Agreement Chapters 1, 2, 3, 5 Notification Placard Appendix C	
Change 7	September 2022	Opening Pages, Chapters 1, 2, 5, 7 Appendix C	
Change 6	January 18, 2022	Opening Pages, Chapter 6	
Change 5	July 18, 2021	Opening Pages	
Change 4	January 18, 2021	Notification Placard, Binding Agreement, Chapters 4, 6	
Change 3	December 8, 2020	Notification Placard	
Change 2	May 5, 2020	Chapters 2, 3	
Change 1	January 2019	Opening Pages, Chapters 1-8 Appendixes A-E	

UPDATING PROCEDURES

This Oil Spill Response Contingency Plan will be maintained and updated by:

NRC Environmental Services Inc.
3500 Sunrise Highway
Great River, NY 11739
Telephone: (631)-224-9141
FAX: (631)-224-9086
www.nrcc.com
Email: rmccoy@republicservices.com

Corrections and suggestions, including constructive criticisms, are not only welcomed, but *encouraged*. Keeping this contingency plan current and useful is an ongoing process. Your assistance will be most appreciated.

This contingency plan will be reviewed and updated as needed to maintain the information contained herein as current as possible. Personnel assignments, names and telephone numbers will be reviewed and updated at least semi-annually. Plan reviews will be completed at least annually with follow-up letter to the Washington Department of Ecology. Plan reviews also follow actual spill response or tabletop exercises. Reviews post-spill response and post-exercise should identify specific required and recommended updates with an assigned responsible person and target date for revision.

Washington Department of Ecology must be notified within 24 hours of any significant changes that may affect its response capability. Written revisions for plan updates in such cases should be distributed within 30 days.

Updated materials will be distributed by a consecutively numbered LETTER OF TRANSMITTAL. Upon receipt of transmittal, take the following actions:

1. Remove / add pages, per instructions.
2. Record the change on the RECORD OF REVISIONS
3. File / retain the LETTER OF TRANSMITTAL immediately following this page.

INTRODUCTION

Contents

1.1 PURPOSE

NRC is approved by Ecology as a PRC meeting current Washington State oil spill contingency planning requirements. The NRC Plan is a planning document designed to provide umbrella coverage to multiple Covered Vessels for oil spills and threatened oil spills pursuant to direct contracts between NRC and Covered Vessel owners, operators and/or agents as provided for by WAC 173-182-110.

The NRC Plan provides Covered Vessels with response planning, emergency communications, spill management and drill and exercise services, as well as the spill response capabilities required for complete compliance with Washington State contingency planning requirements. The NRC Plan is also designed for the use and information of owners, operators, demise charterers, agents, and supplementary spill management personnel during spills by Covered Vessels.

For additional details or information regarding the NRC Plan, please contact:

Ryan McCoy
Regulatory Specialist
3500 Sunrise Highway, Bldg 200, Ste 200
Great River, NY 11739

Telephone: (632) 224-9141 (24 hours)
FAX: (631) 224-9086

1.2 FUNCTION AND SCOPE OF THE NRC PLAN

The area of coverage for the NRC Plan is within the navigable waters of the State of Washington (as defined by WAC 317-05-020 (10)) with the exception of the Columbia River system. NRC will contract with vessel owners, operators, demise charterers and agents which desire NRC Plan coverage to meet Washington State contingency planning requirements within the NRC Plan's area of coverage.

In the event of an oil spill or threat of oil spill, the RP (spiller: owner, operator or demise charter) is required by Washington State regulations to take immediate action to protect life and property, and notify proper authorities. This includes, for example, personnel safety, preventing further damage, protecting wildlife resources, cleaning up the spill, and restoring the environment.

The NRC Plan will assist the responsible party in executing these functions by providing an emergency notification network and response services including pre-positioned equipment and personnel dedicated to immediate response, i.e., within two hours of notification -- given suitable safety conditions. When a spill occurs from a Covered Vessel, the NRC Plan provides for the prompt, safe and efficient containment, recovery, cleanup / restoration and interim disposal of all oil and oily debris.

The NRC Plan also provides the RP with a SMT located within Washington State to ensure rapid on-scene response. Covered Vessels will also designate their own QI when contracting for NRC Plan coverage. The contact information for each Covered Vessel is maintained on the NRC Plan website with Covered Vessel information. The NRC Plan is also structured so that in the event of a spill, the Covered Vessel may transition to their own SMT directed by the QI and approved by the SOSC and FOSC, in which case the NRC Plan SMT members will work with the QI to ensure a smooth transition to Covered Vessel designated SMT.

In general, the NRC Plan functions include:

- Maintain and update resources and services as needed to meet Washington State contingency planning requirements for Covered Vessels.
- Hold response readiness drills and exercises as required by Washington State regulations.

- Provide an emergency response notification system for Covered Vessels while operating in covered Washington State waters.
- Provide for initial response to a spill, or threat of a spill, until if such time arises that there is an organized transition to the covered vessels QI or spill management team.

NRC maintains a constant state of readiness to respond to any oil spill or potential oil spill from a Covered Vessel. Upon notification from a Covered Vessel of a spill or threat of a spill, the NRC Plan is considered activated and NRC will initiate the following actions for the responsible party:

- Notify the on-duty IC on behalf of the Covered Vessel with available information
- Mobilize response equipment and personnel as appropriate in consultation with the IC
- Notify Washington EMD / Ecology (automatic, unless notification has already been made by the responsible party)
- Notify U.S. Coast Guard National Response Center if requested by the responsible party
- Activate NRC response management organization and mobilize appropriate spill management team members
- Manage spill response operations, per action plan and consistent with the Northwest Area Contingency Plan (NWACP)

1.3 VESSELS COVERED BY THE NRC PLAN

The following types of vessels are required by Washington State law to have an approved contingency plan filed with the state:

- Tank vessels, including barges, constructed or adapted to carry oil in bulk as cargo or cargo residue
- Cargo and other self-propelled vessels in commercial service of 300 or more gross tons, including but not limited to, commercial fish processing vessels and freighters
- Passenger vessels of 300 or more gross tons with a fuel capacity of at least six thousand gallons that carry passengers for compensation

The NRC Plan provides oil spill contingency plan coverage to all these vessels for which the owner, owner's representative or vessel agent has executed a contract with NRC. Vessels needing coverage prior to entering Washington State waters can contract for coverage within a matter of hours by contacting the NRC Seattle office.

All Covered Vessel owner, operator or demise charterer will sign an Addendum (see Figure 1-1) to the NRC Agreement for Provision of Response Resources contractually committing to the client to the implementation of the NRC Plan on behalf of those of its vessels covered by the Agreement when operating in the NRC Plan Coverage Area and appoints NRC as its designee, as permitted in WAC 173-182-220, and directs NRC to submit the Plan certification on behalf of

the Client and the Client's Covered Vessels. Covered Vessel Addendums will be available upon request for review by Ecology.

Figure 1-1 Addendum for Washington State Contingency Plan Coverage

Addendum

The Agreement for Provision of Response Resources (Agreement), between National Response Corporation (Provider) and_____ (Client), dated _____, is hereby amended as follows:

Washington State Contingency Plan Coverage

In accord with the provisions and definitions set forth in Washington State Administrative Code Chapter 173-182, Provider shall maintain a Contingency Plan (Plan) approved by the State of Washington's Department of Ecology for coverage of vessels operating in Washington State waters, excluding the Columbia River, as described in the Plan (Plan Coverage Area), including meeting drill and exercise requirements. Provider shall also meet oil spill response planning requirements as outlined in the Plan.

Client commits to the implementation of the Plan on behalf of those of its vessels covered by the Agreement when operating in the Plan Coverage Area (Covered Vessels). Client appoints Provider its designee, as permitted in WAC 173-182-220, and directs Provider to submit the following Plan certification on behalf of the Client and the Client's Covered Vessels as follows:

> I certify I have reviewed and am familiar with the information submitted in this Plan. I verify acceptance of the plan and commit to (a) a safe and immediate response to spills and to substantial threats of spills that occur in, or could impact Washington waters or Washington's natural, cultural and economic resources; (b) having an incident commander in the state within six hours after notification of a spill; (c) the implementation and use of the plan during a spill and substantial threat of a spill, and to the training of personnel to implement the plan; (d) the authority and capability to make the necessary and appropriate expenditures in order to implement plan provisions; (e) working in unified command within the incident command system to ensure that all personnel and equipment resources necessary to the response will be called out to clean up the spill safely and to the maximum extent practicable.

Client acknowledges that Provider will submit the certification set forth in WAC 173-182-220 as the disclosed designee for the Client.

Provider will provide Client with the Plan Field Document and Notification Placard. Client will ensure that they are provided for use on the bridge of each Covered Vessel (or in the pilot house of the tug towing a covered barge) prior to such vessel's arrival in Plan Coverage Area and Client agrees to follow the notification requirements outlined therein in the event of a spill or threatened oil spill.

In the event of a spill or threatened spill, the Plan provides the initial Incident Commander on behalf of the Covered Vessel (Plan IC) and spill management team until a formal transition occurs from the provider to the Client's designated Qualified Individual (QI) as delineated in section 3.2 of the Plan. The Plan IC will initiate response activities and direct response resources in the initial phase of the response to the spill or threat of a spill. The Plan IC will liaise so far as practicable with the Client and the QI regarding the response and resource direction. Client authorizes and directs its QI to coordinate with the Plan IC as soon as possible upon a report of a spill or threatened oil spill from the Covered Vessel.

Fees for the addition of Washington State Contingency Plan and oil spill response capabilities as described above (Covered Vessel Fees) shall be added to Agreement Schedule 3, Basic Compensation.

Except as expressly amended or modified hereunder, all other terms of the Agreement shall remain in full force and in effect.

For and on behalf of Provider	For and on behalf of Client
_____	_____
Name: _____	Name: _____
Position: _____	Position: _____
Date: _____	Date: _____

As part of the initial contracting process, NRC will provide the owner, owner's representative or vessel agent with electronic copies of the NRC Field Document and the NRC Notification Placard via email. These documents will also be available to Covered Vessels on the NRC Plan webpage (www.nrcc.com). The Addendum also requires that the Covered Vessel representative commits to ensuring that Covered Vessels have the Field Document and Notification Placard on the bridge while in Washington State waters.

NRC is committed to training RP representatives and Covered Vessels on the use of the NRC Plan. In addition to the instruction provided at the time of setting up a Covered Vessels contract, NRC is also in regular contact with its clients through frequently published Client Circulars, annual contract updates, visits to domestic and foreign client offices, meetings with agents and participation in drills and exercises. As part of this outreach program, copies of the Field Guide and the Notification Placard will be sent to all RP representatives and Covered Vessels annually via email.

NRC maintains a database of all Covered Vessels which is updated in real time and available for review by Ecology on the NRC Plan webpage at any time. Covered Vessel information in this database includes:

- Covered Vessel name
- contracting entity (owner, operator, agent or demise charterer) contact information
- call sign
- country of registry
- vessel diagram
- gross registered tonnage
- petroleum cargo capacity (if applicable)
- fuel capacity
- any designated QI and/or SMT
- official number.

The ports of call, including refineries, are listed in Table 1-3. NRC commits to assisting Ecology and/or USCG to obtain additional information from the Covered Vessel RP as requested.

NRC Plan potential Covered Vessels include all vessel types operating in Washington State waters. At any given time, in ports throughout the Puget Sound region (see Table 1-3), Covered Vessel operations may include:

- cargo vessel or tanker load/offload
- general transits
- fishing vessel transits and load/offload
- ferry transits
- fuel transfer
- bunkering operations

The types of vessels historically operating in Washington State waters, including typical tonnage and volumes carried, are outlined in Table 1-1. Table 1-2 includes all known fuel and cargo products carried by NRC Covered Vessels. All products listed fall under the definition of Non-Floating Oils except those indicated with an asterisk (*). The list will be updated as needed for any additional products identified as being carried by NRC Covered Vessels.

Table 1-1 Typical NRC Covered Vessels Operating in Washington

Type	Minimum GRT	Maximum GRT	Petroleum Oil Groups	Fuel and Cargo Total Volume (bbl)
Cargo	497	108,393	1 – 4	26,395
Ferry	498	9,978	1	2,060
Fishing	341	17,845	1	3,464
Tugs	393	12,892	1	4,811
Passenger	409	115,875	1	18.352
Tank Barge	178	58,555	1 – 4	53,412
Tanker	32	87,146	1 – 4	579,567
Tanker (Non-Petroleum)	7,271	30,053	Other	190,214
ATB	9,708	13,500	1	172,196
Offshore Drilling Vessel	13,485	32,690	1	19,935

Table 1-2 Fuel and Cargo Carried by NRC Covered Vessels

Product Name	Vapour Density	Specific Gravity	API	Oil Group Number	Sulfur (wt %)
Caroline Condensate*	>1	0.75	56.0	1	0.49
Premium Gasoline*	>1	0.70	70.9	1	0.02
Pembina Condensate*	>1	0.76	54.5	1	0.16
BC Light Crude	>1	0.83	39.8	2	0.60
Light Sour Oil	>1	0.83	39.4	2	0.76
Pembina Crude	>1	0.83	38.9	2	0.43
Premium Synthetic	>1	0.84	37.0	2	0.08
Rainbow Crude	>1	0.84	37.8	2	0.49
Mixed Sweet Blend	>1	0.84	37.6	2	0.47
Horizon Synthetic	>1	0.85	34.4	3	0.08
Central Alberta KOC	>1	0.85	35.4	3	1.07
Suncor Synthetic A	>1	0.86	32.7	3	0.20
Suncor Synthetic C	>1	0.88	30.0	3	0.22
Premium Albian Synthetic	>1	0.86	33.1	3	0.10
Shell Synthetic Light	>1	0.87	31.6	3	0.22
Syncrude	>1	0.86	32.4	3	0.18
Albian Residual Blend	>1	0.93	20.5	3	2.70
Albian Heavy Synthetic	>1	0.94	19.6	3	2.47
Albian Muskeg Heavy	>1	0.93	20.7	3	3.95
Albian Vacuum Gas Oil	>1	0.92	22.3	3	3.16
Access Western Blend	>1	0.92	22.6	3	3.82
Borealis Heavy Blend	>1	0.92	22.0	3	3.60
Cold Lake Blend	>1	0.93	21.4	3	3.72
McKay Heavy	>1	0.93	21.0	3	2.60
Oil Sands Q	>1	0.92	22.3	3	3.90
Long Lake Heavy	>1	0.93	20.4	3	3.22
Peace Heavy	>1	0.93	21.3	3	5.11
Seal Heavy	>1	0.93	20.5	3	4.79
Statoil Cheecham Blend	>1	0.93	20.5	3	3.83
Statoil Cheecham Syn- Bit	>1	0.94	19.0	3	2.86
Statoil Cheecham Mixed Blend	>1	0.94	19.8	3	3.30
Suncor Synthetic H	>1	0.94	19.8	3	3.09
Surmont Heavy	>1	0.94	19.7	3	2.97
Bunker /Residual Fuel Oils	>1	.93-1.0	9.5-10	3	3.5-4.5
Marine Diesel	>1	0.85	35.0	3	0.50

Table 1-3 Ports of Call for NRC Covered Vessels

Aberdeen	Kingston
Anacortes *****	La Conner
Bellingham	Neah Bay
Blaine*****	Olympia
Bremerton	Port Angeles
Edmonds	Pt Townsend
Everett	Richmond Beach*
Ferndale*****	Seattle
Hoquiam	Shelton
Keyport	Tacoma*****
***Refineries: Shell, Tesoro, BP, Phillips66 and U.S. Oil**	

1.4 WORST CASE SPILL COVERAGE

As defined, WAC 173-182-030(73)(c) defines a worst case spill WCS from a vessel as, “a spill of the vessel's entire cargo and fuel complicated by adverse weather conditions…” Under 33 CFR 165.1303, vessels entering Puget Sound may not exceed 125,000 Dead Weight Ton. This has been previously established to equate to a WCS in Washington State of 813,000 bbls (~35 million gallons) which is the maximum WCS volume for vessels covered by the NRC Plan. NRC commits to revising the maximum WCS if a larger WCS volume is identified.

Both tank and non-tank Covered Vessels with the maximum WCD transit the following planning standard areas:

- San Juan County (WAC 173-182-370)
- Padilla Bay (WAC 173-182-375)
- Dungeness (WAC 173-182-390)
- Neah Bay Staging Area (WAC 173-182-395)
- Washington Coast (WAC 173-182-450)
- Commencement Bay-Quartermaster Harbor (WAC 173-182-380)
- Locations where Covered Vessels transfers occur (WAC 173-182-355)

Lower WCD Covered Vessels transit other planning standard areas as follows:

- Nisqually (WAC 173-182-385) – 23,409 bbls
- Grays Harbor (WAC 173-182-405) - 20,000 bbls (non-tank) 285,000 bbls (tank)

For the Grays Harbor Planning Standard Area, the NRC Plan will use NRC response resources to cover vessels with a WCS amount up to 20,000 bbls. Coverage of vessels carrying combined cargo and fuel in excess of this amount, transiting to or from the REG Grays Harbor LLC (REG) facility, will be covered by a combination of resources provided by the NRC Plan and

supplemental NRC resources provided on an advance notice basis directly to REG in order to implement additional, specific prevention and preparedness measures detailed in the REG Contingency Plan Alternative Planning Standard outline in Section 5.4.3.

Other planning standard areas listed in WAC 173-182 and not mentioned here are not transited by NRC Covered Vessels. Vessels transiting these areas would not be covered by the NRC Oil Spill Contingency Plan. Table 1-3 outlines the ports of call, including refineries that NRC Covered Vessels call on.

1.5 NOTIFICATION REQUIREMENTS

Any and all spills, no matter the amount, and potential spills need to be reported. Failure to report an oil spill to the U.S. Coast Guard National Response Center, and the WEMD, is a violation of law, and is punishable by fine and/or imprisonment. Specific organizations, agencies and individuals to be notified in the event of an oil spill are detailed in Chapter 2.

IMPORTANT REMINDER
FINES AND / OR IMPRISONMENT
FOR
FAILURE TO REPORT

1.6 RESPONSIBLE PARTY

In the event of an oil spill or threatened oil spill, the responsible party (spiller: owner, operator or demise charter) must take immediate action to protect life and property, and notify proper authorities. Federal and state laws require that the cleanup of a spill should be immediate, and mitigation should be substantial.

Specific responsible party responsibilities include:

- Require Covered Vessel to immediately and directly notify NRC
- Notification to federal / state authorities
- Assessment of spill
- Identity / document type and quantity of product spilled
- Prompt containment of spilled product
- Timely and effective cleanup
- Wildlife preservation
- Restoration of damaged environment / natural resources
- Disposal of oil and oily debris
- Provide cooperation and assistance requested by responsible officials
- Establish and advertise claims procedures
- Payment for cleanup and damages
- Take steps to prevent re-occurrence of spills

NOTE: Failure to comply, remove or cooperate can be costly, e.g. (per Oil Pollution Act of 1990, P.L. 101-380) in addition to civil penalties and criminal prosecution, the responsible party can be

held liable for triple (3x) the costs incurred as well as risk loss of defenses to liability and limits on liability. See Section 1.7 for details.

1.7 LAWS AND REGULATIONS

1.7.1 Federal

The 1972 Federal Water Pollution Control Act (33 U.S.C. 1251 et seq), as amended (Clean Water Act of 1977), prohibits the discharge of "harmful quantities" of oil or oily products into the waters of the United States. "Harmful quantity" is defined as "**enough to produce a slick or visible sheen (rainbow color) on the surface of the water.**"

Violations can result in criminal prosecution, or a civil penalty for each offense, multiplied by each day of violation. This applies to both individuals and organizations. The spiller is also strictly liable for all cleanup costs and other damages.

Federal law also requires that EVERY SPILL BE REPORTED to the USCG or the EPA. Failure to report an oil spill is a CRIMINAL PENALTY, punishable by fine and/or imprisonment.

Section 4301 of the OIL POLLUTION ACT OF 1990 (P.L. 101-380), referred to as OPA 90, significantly increased the civil and criminal penalties under the Federal Water Pollution Control Act (also known as the Clean Water Act). Civil penalties now include up to $27,500/day of violation or up to $1,000/barrel of oil discharged. Criminal penalties include fines up to $500,000 and up to 25 years of imprisonment. See 18 U.S.C. 3553, 3559, 3572, 33 U.S.C. 1321(b); 46 U.S.C. 2303, 3318, 3718, 5116; 33 CFR 153.205.

As noted above, in addition failure to comply, cooperate or clean up the spill can be extremely costly. Under the oil pollution liability and compensation requirements in OPA 90, the RP (spiller) can be held liable for up to triple (3x) the costs incurred; and, could lose all defenses to liability and limits on liability.

Federal limits of liability were increased in July 2006 and are now:

- For single hull tankers 3,000 gt or less, $3K per gross ton or $6M, whichever is greater
- For single hull tankers greater than 3,000 gt, $3K per gross ton or $22M, whichever is greater
- For double hull tankers 3,000 gt or less, $1.9K per gross ton of $4.0M, whichever is greater
- For double hull tankers greater than 3,000 gt, $1.9K per gross ton or $16.0M, whichever is greater
- For non-tank vessels, $950 per gross ton or $800K, whichever is greater. (See Coast Guard and Maritime Transportation Act of 2006, Public Law # 109-241)

Federal laws and regulations concerning oil pollution are enforced by the USCG and the EPA.

1.7.2 Washington State

Washington State laws and regulations concerning oil pollution are enforced by Ecology. R.C.W. 90.56.320 prohibits oil pollution in any manner whatsoever; regardless of whether it be

the result of intentional or negligent conduct, accident or other cause. Any discharge of oil, oily materials, or other hazardous substances into the water MUST BE REPORTED IMMEDIATELY, and steps taken to clean up the spill.

Provision is made in the state law for fines and penalties which can range to $100,000 per incident, and for each day the spill poses risks to the environment in the case of an oil spill due to negligence. If a person intentionally or recklessly spills oil into the waters of Washington they may be subject to a penalty of $500,000 per incident and for each day the spill poses a risk to the environment. In addition to these penalties, the spiller is also liable for the cost of the cleanup and reimbursement for environmental damage.

R.C.W. 88.40.020 also requires any vessel over 300 gross tons that transports petroleum products as cargo, to provide evidence of financial responsibility in the amount of the greater of $1,000,000, or $150 per gross ton of such vessel to meet liability requirements for spill cleanup costs, fines and penalties, and natural resource damages.

1.8 FEDERAL ROLES, RESPONSIBILITIES AND AUTHORITY

1.8.1 Federal Policy

The National Oil and Hazardous Substances Pollution Contingency Plan, 40 C.F.R., Part 300, provides for the nationwide coordinated response to oil and hazardous substance pollution. This includes the establishment of Regional Response Teams, and designation of a FOSC for all reported incidents.

1.8.2 Assignment of Federal On-Scene Coordinator (FOSC)

In general, USCG provides a FOSC for spills in the coastal zone. The EPA provides a FOSC for the inland zone.

1.8.3 FOSC Responsibilities

FOSC responsibilities and authorities are outlined in Section 300.120 of the NCP (40 CFR). Under the NCP, the FOSC is tasked with directing the response. This is accomplished through implementation of a spill management framework in accordance with the National Response Plan, National Incident Management System (NIMS) Incident Command System (ICS). Under NIMS ICS, a Unified Command (UC) is established, bringing together the FOSC, the State OSC and the Responsible Party IC.

Resources are coordinated by the UC to achieve an effective and efficient response.

This includes:

- Evaluating the magnitude of discharge, or potential
- Making appropriate notifications
- Ensuring safety of public and responders
- Evaluating threat to environmental resources
- Determining feasibility of removal

- Initiating containment efforts when discharge is either unknown or unavailable
- Assuming control of response operations when response efforts of the responsible party are not adequate
- Monitor response operations
- Determine when removal is complete
- Initiate enforcement action

The general philosophy of the Coast Guard and the EPA is to allow the spiller to clean up the spill, provided there is adequate progress. The FOSC will give advice and directions concerning methods of handling the spill and the thoroughness of the cleanup.

Federal On-Scene Coordinators are familiar with the spill area and will have access to a variety of information, including current charts, tide data, environmental sensitivity atlas, spill trajectory models, and weather information.

1.8.4 National Strike Force (NSF) Teams

The USCG has established regional strike teams (Atlantic, Gulf and Pacific) to provide “rapidly deployable technical experts, specialized equipment, and incident management capabilities for Lead Agency Incident Commanders and Federal On-Scene Coordinators for their response and preparedness mission.” (excerpt from USCG NSF Mission Statement) NSF capabilities include personnel trained to fill positions within the ICS structure, serve as ICS coaches, act as field monitors, provide technical expertise, deploy and operate spill response equipment, conduct air monitoring and provide emergency public information services.

Should NSF support be needed for a spill, the appropriate resources would be requested by the FOSC. The NSF is available 24 hours a day, 7 days a week to meet these requests. The Pacific Strike Team, home based in Novato, CA, is the closest team to the State of Washington.

Additional support from the Atlantic and Gulf Strike Teams may be required depending on the scope and scale of the response. The RP is responsible for the costs of NSF support, which are based on established rates.

1.9 STATE ROLES, RESPONSIBILITIES AND AUTHORITY

The Department of Ecology (Ecology) is the designated lead agency for environmental pollution response within the state of Washington. As lead agency, Ecology is responsible “to oversee prevention, abatement, response, containment, and cleanup efforts with regard to an oil or hazardous substance spill to waters of the state. The director is the head of the state incident command system in response to a spill of oil or hazardous substances and shall coordinate the response efforts of all state agencies and local emergency response personnel.” (Chapter 90.56.020 RCW).

Ecology has pre-designated the State On-Scene Coordinator (SOSC) for spills occurring in state jurisdiction to represent all state agencies and the interests of the state and its citizens. Subject to the organization and duties outlined in the NWACP Ecology responsibilities include:

- Provide emergency response to reported oil and hazardous substance spill incidents (24 hours/day)

- Confirm emergency notifications
- Determine the source and cause of an incident
- Identify the responsible party for an oil spill or hazardous substance release
- Assume responsibility for incident management and cleanup if the responsible party is unavailable, unresponsive, or unidentified
- Set state cleanup standards and ensures that source control, containment, cleanup and disposal are accomplished
- Assist in monitoring and ensuring the safety of first responders and other personnel;
- Determine the need for and initiates appropriate enforcement actions
- Coordinate spill response with other state and federal agencies and tribal and local jurisdictions using the National Incident Management System (NIMS) model of Incident Command System (ICS)
- Establish a Joint Information Center (JIC) with involved agencies and the responsible party to provide current and accurate information to the community
- Conduct on-site inspections of commercial vessels and oil handling facilities
- Investigate the cause of commercial vessels and oil handling facility spills
- Provide maritime expertise, such as advise on salvage operations
- Lead, activate, and coordinate the State Natural Resource Damage Assessment (NRDA) team
- Participate in the activities of the Wildlife Branch of the Operations Section of the ICS
- Notify the appropriate resource trustee agency of injury to fish, shellfish, habitat, and other wildlife
- Fill the position of Environmental Unit Leader within the NIMS ICS structure

1.10 LOCAL AGENCY ROLES, RESPONSIBILITIES AND AUTHORITY

Local governments and agencies have a duty to be prepared for all emergencies. The State Department of Community Development and WEMD are charged with establishing Local Emergency Planning Districts and Local Emergency Planning Committees to facilitate planning efforts.

LEPCs have the responsibility to create local emergency response plans. General requirements for local response plans are contained in Title III of the Superfund Amendments and Reauthorization Act of 1986.

Generally, local agencies, particularly fire and police, can be expected to provide emergency response services when there is a threat to life and property. Emergency response services may include: fire and explosion control, perimeter control, evacuation, traffic control and initial containment or even removal depending on the nature of the incident.

It is the responsibility of on-scene coordinators to become familiar with the capability of local responders and local emergency plans as they pertain to spills, and to help develop workable local plans with the appropriate local planning agencies.

1.11 PRIMARY RESPONSE CONTRACTORS

Contractors hired by or for the responsible party are responsible to carry out recovery and / or cleanup operations in conformance with federal, state and local laws, and approved contingency plans -- with safety of all personnel being the primary objective.

Any contractor hired by the responsible party, FOSC, or SOSC is responsible to carry out recovery / cleanup operations as directed by that individual or agency.

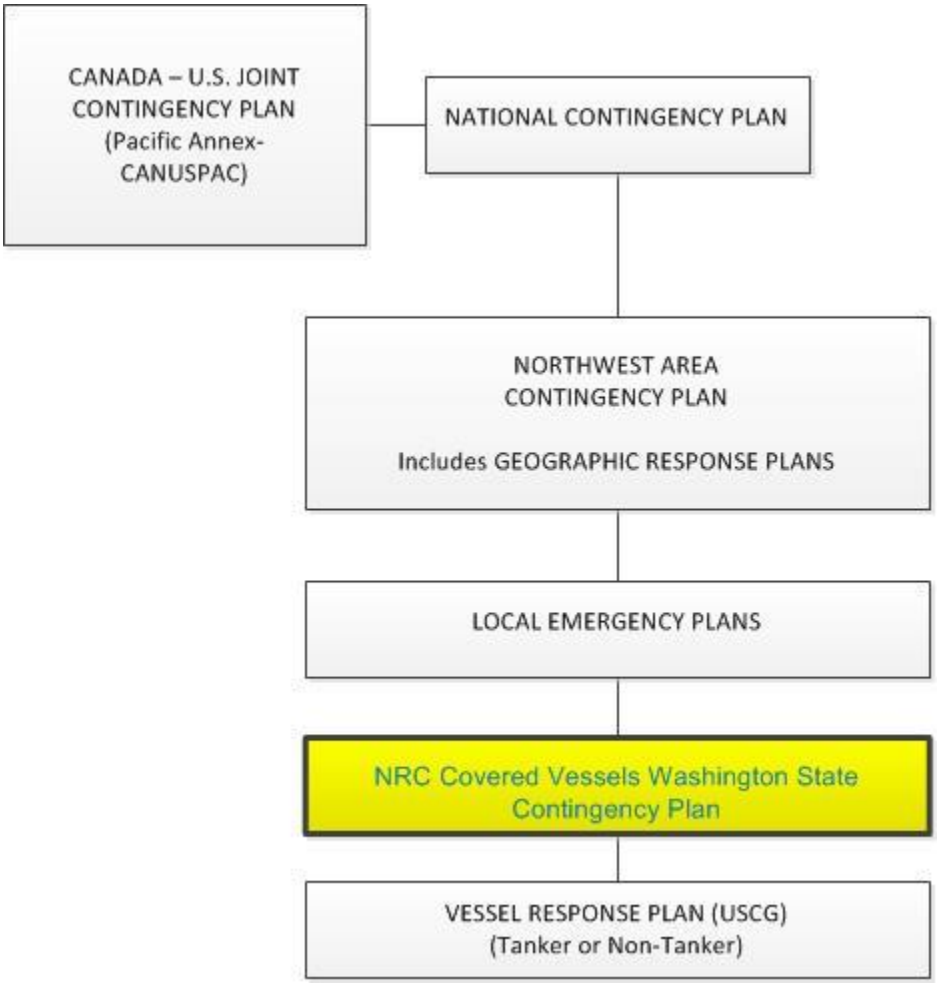
Any suggestions, recommendations or specific work orders made by the OSC (federal or state) while monitoring a spill response will be directed to the RP or its designated representative, and not directly to the contractor -- unless the contractor is designated by the responsible party as its agent.

PRCs must be approved / certified by the State of Washington pursuant to WAC 173-182.800. NRC is a state approved PRC (see Section 5.4 and Appendix A for additional information regarding NRC's' oil spill response capabilities). NRC also has contracts and letters of intent for access to additional dedicated and non-dedicated oil spill response equipment which are submitted as part of the NRC PRC Application.

NRC has pre-positioned vessels, equipment and trained personnel in strategic locations throughout Washington, Oregon and California. These resources are always ready (24-hours / day) on immediate standby status. Washington State regulations require PRCs to begin mobilization efforts immediately but no later than one hour from notification of a spill. NRC personnel assigned to 2-hour response assists are required to report within a maximum of one hour to their assigned vessel staged such that they can be on scene within the prescribed time limits.

Through NRC's prepositioned response equipment and ready response personnel, NRC meets the boom, recovery and storage planning standard requirements for the WCS amounts in the planning standard areas as described in Section 1.4. Until infrastructure improvements in Neah Bay allow staging certain equipment in the local area, an alternate planning standard is used for the coverage of these Neah Bay Planning Area recovery and storage requirements as described in Chapter 5, Section 5.4.2.

Figure 1-2 Relationship of Federal, State and Local Oil Spill Contingency Plans



1.12 STRATEGY TO ENSURE USE OF PLAN

To ensure use of this plan, pursuant to WAC 173-182-145:

Copies of the NRC Plan are distributed to appropriate regulatory agencies and individuals (see page iii). Additional copies of this plan may be available, at cost, from NRC and will be available in electronic version at no cost.

- NRC will communicate directly with Covered Vessel representatives, state and federal agencies, response management organizations, insurers and other related personnel and organizations regarding Covered Vessel contingency plan responsibilities.
- The NRC oil spill response organization is trained and exercised on this plan. This plan is reviewed and utilized during annual table-top exercises and training.
- This plan will be implemented during any response to a spill or drill.

1.13 FIELD DOCUMENT

The FIELD DOCUMENT is for use by the Covered Vessel in the event of an oil spill or threatened oil spill. The FIELD DOCUMENT identifies the key notifications and action elements of the NRC Plan. A copy of the FIELD DOCUMENT is provided when the NRC contract for coverage is signed. The NRC contract requires that the contracting entity ensures each Covered Vessel has a copy of the NRC FIELD DOCUMENT provided for use on the bridge of the vessel.

Additional copies may be obtained from NRC by calling 206-607-3000 or downloaded at www.nrcc.com. The FIELD DOCUMENT is required by state law to be aboard Covered Vessels prior to arrival into NRC Plan covered waters. The Covered Vessel and/or Owner/Operator will follow notification requirements outlined in the FIELD DOCUMENT.

1.14 PLAN UPDATING PROCEDURES

The NRC Plan will be reviewed at least annually and following each incident or exercise as/if necessary. Specifically, the plan will be updated for significant changes, both temporary and permanent, in equipment and personnel in accordance with WAC 173-182-142. Personnel assignments, names and telephone numbers will be reviewed and updated at least semi-annually. Reviews post-spill response and post-exercise should identify specific required and recommended updates with an assigned responsible person and target date for revision.

NRC commits to submitting changes to Ecology within 30 days of the review and will provide a notice in writing to Ecology within 24 hours of any significant change in the availability of spill response resources.

The plan shall be reviewed and modified if necessary and submitted to Ecology for approval every five years following initial approval.

2. NOTIFICATION REQUIREMENTS

Contents

2.1 MANDATORY REQUIREMENTS

2.1.1 NRC

All spills of oil or hazardous substances or the threat of such a spill MUST BE REPORTED IMMEDIATELY and DIRECTLY by the Covered Vessel's representative (vessel master, owner, agent) to the NRC IOC 24-hour response number as follows:

1-631-224-9141 or 1-877-880-4672

It is imperative that the NRC IOC be notified immediately so that spill response resources can be mobilized without delay. The success of the containment and cleanup operation depends on the timely notification and activation of response resources, as directed by the NRC IC.

Note: Strait of Juan de Fuca Notification Requirements apply as follows:

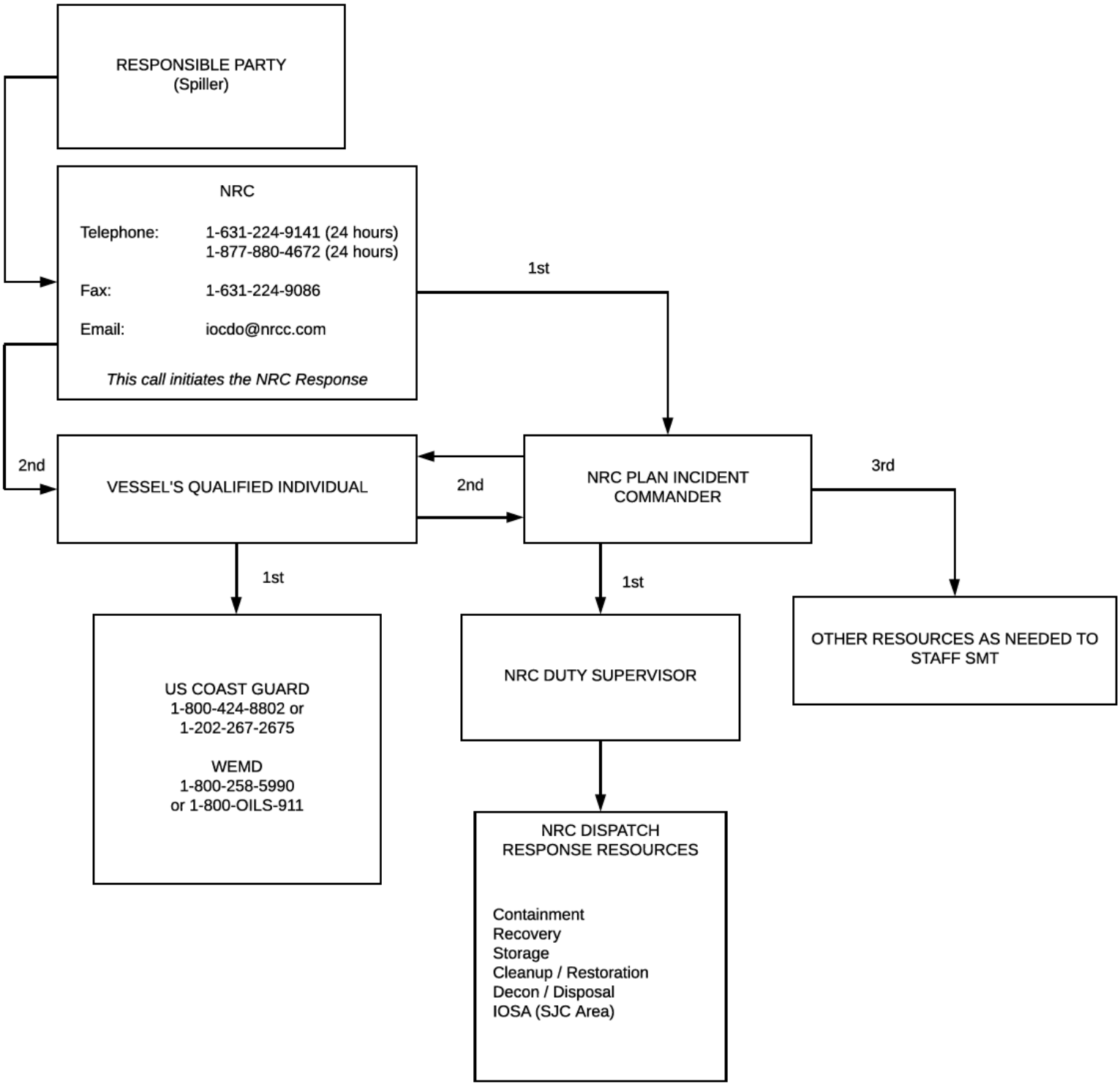
There is a reciprocal arrangement in place between NRC and WCMRC that applies to spill response notifications and coverage of NRC Covered Vessels inbound and outbound through the Strait of Juan de Fuca as follows:

NRC Plan Covered Vessels **inbound to or outbound from a Washington port** reporting a spill or threatened spill in the Strait of Juan de Fuca should notify the NRC IOC regardless of the location of the vessel (Canada or US/Washington Waters). If the Covered Vessel is determined to be located in Canadian waters at the time of the spill, NRC will notify WCMRC.

NRC Plan Covered Vessels **inbound to or outbound from Canadian port** reporting a spill or threatened spill in the Strait of Juan de Fuca should notify WCMRC at the Emergency Contact Number as shown on their WCMRC coverage agreement. If the vessel is determined to be located in US/Washington state waters at the time of the spill, WCMRC will contact the NRC IOC to commence response.

The on-call NRC IC will be notified on behalf of the Covered Vessel by NRC pursuant to its contract with the Covered Vessel for NRC Plan coverage. While on-duty, the NRC IC will be available for immediate call out, 24-hours per day. Cell phones will be utilized to ensure that a constant standby status is maintained.

Figure 2-1 Call-Down Sequence for Spill Reporting



2.1.2 Federal and State

Once the Covered Vessel's QI has been notified by the Covered Vessel, the QI will notify federal authorities unless the owner/operator directs otherwise.

> **Note:** Any person who fails to notify the appropriate federal and state agencies immediately of a discharge, is, upon conviction, subject to fine or imprisonment, or both. It is important to coordinate these notifications in order to be certain that they are made on a timely basis. However, it is also important to not make redundant reports to the same agency.

The call-down sequence diagram, provided in Figure 2-1, includes NRC, the Covered Vessel QI, and internal NRC procedures for responding to an oil spill or threatened spill reports from Covered Vessels and all federal and state mandatory reporting requirements.

Title 33 CFR 153.203 requires that any person in charge of a vessel having knowledge of any discharge of oil or a hazardous substance must immediately notify:

- NATIONAL RESPONSE CENTER
  1-800-424-8802

OR, if above is not practicable, notify the:

USCG Sector Command Center for the geographic area where discharge occurs or the nearest US Coast Guard unit -- provided, however, that the person in charge of the vessel also notifies the National Response Center as soon as possible.

The NRC Plan area of coverage falls in two USCG Sectors. The respective area of operation for these two Sectors along with contact information is listed below.

For spills in Puget Sound and along the outer coast, north of the Queets River (Jefferson/Grays Harbor County line) contact:

- USCG Sector Puget Sound Command Center
  1-206-217-6001

.
For spills in Grays Harbor, along the outer coast, south of the Queets River, and in the Columbia/Willamette Rivers contact:

- USCG Sector Columbia River Command Center
  1-503-861-6211

In addition to notifying the USCG, Washington State RCW 90.56.280 also requires any person discharging oil or hazardous substance or otherwise causing, or permitting, or allowing the same to enter the waters of the state to immediately notify:

- Washington Emergency Management Division (WEMD):
  1-800-258-5990

Note: The Covered Vessel QI is responsible for notifying USCG and WEMD, unless the Covered Vessel representative confirms to the QI that the notification has or will be made by the Covered Vessel. WEMD will then notify predetermined agencies, organizations, and jurisdictions, specifically including Ecology.

2.2 WHAT TO REPORT

2.2.1 Reporting a spill or potential spill

The Initial Spill Report Form included in the NRC Field Document (see Figure 2-2) details the basic information necessary to report a spill or threatened spill. This form should be completed to the extent possible for notification and record purposes however, DO NOT DELAY notification even if all information is not immediately available.

- **Report only what you know.**
- **Do not guess or speculate.**

2.2.2 Reporting a vessel emergency

In addition to reporting an oil spill or potential oil spill, under Washington law, vessel owner/operators are also required to report any vessel emergency that results in the discharge or substantial threat of discharge of oil to state waters or that may affect natural resources of the state. This notification must be made within one (1) hour of the onset of the emergency and be reported to WEMD using the same number listed above (1-800-258-5990).

A vessel emergency is defined as “a substantial threat of pollution originating from a covered vessel, including a loss or serious degradation of propulsion, steering, means of navigation, electrical generating capability and seakeeping capability.”

Some examples of vessel emergencies might include uncontrolled fire or flooding; loss of propulsion in a drifting vessel; grounding, collision or sinking; major failure or damage to the vessel’s structure that could result in flooding or sinking; allision with a breach of the hull; reduction of stability for the vessel; explosion resulting in a major failure of or damage to the vessel’s structure, broken tow wire between a towing vessel and a barge or a breach of watertight envelope and/or tank containing oil. Some common-sense, reasonable factors in determining whether a vessel emergency substantially threatens the natural resources of the state include the following:

- Ship location and proximity to land or other navigational hazards
- Weather, tidal currents and sea state
- Traffic density
- Timing or likelihood of vessel repairs

Figure 2.2 Field Document Initial Spill Report Form

INITIAL SPILL REPORT & "*1 CALL* REPORTING"

DRILL, ACTUAL OR THREATENED* (CIRCLE ONE) **NRC CONTROL #:**_____

**NOTE: All Calls from NRC WA Plan Covered Vessels Must Immediately be Reported to the On-Duty NRC WA Plan IC*

DATE & TIME: _____ DUTY OFFICER:_____

NAME OF CALLER: _____ ***POSITION/TITLE:*** _____

PHONE:_____ ***FAX:***_____

QI: NAME/PHONE: _____ FAX: _____

CASUALTY DESCRIPTION

VESSEL OR ASSET NAME:_____

OWNER/OPERATOR: _____

LOCATION (ADDRESS, BLOCK OR LAT/LONG):_____

NATURE OF INCIDENT:_____

DATE/TIME INCIDENT OCCURRED:_____

CARGO TYPE:_____ ***AMOUNT ONBOARD:***_____ AMOUNT SPILLED:_____

HAS SPILL BEEN STOPPED?_____

WHAT IS APPROXIMATE SPILL RATE?_____

WHAT IS APPARENT SIZE & DIRECTION OF THE SLICK?_____

ADDITIONAL INFORMATION:_____

_____

_____

WHAT SPECIFIC ASSISTANCE OR SERVICES DO YOU REQUIRE (SPILL RESPONSE, FIREFIGHTING, SALVAGE, EMERGENCY LIGHTERING?):

_____

_____

_____

"ARE YOU GRANTING NRC AUTHORIZATION TO PROCEED?" YES NO
I will be sending you an Authorization to Proceed form. Please sign, date and return fax to NRC at 631-224-9086 or email iocdo@nrcc.com.
In the meantime I will initiate a response based on your verbal authorization. Is that acceptable? Yes / No

NOTIFICATION TIMES

_____PRESIDENT _____VP OPS & MARINE _____REGIONAL MGR

_____OPS DIRECTOR _____LOGISTICS _____FINANCE _____AWAY TEAM

_____GROUP PAGE _____RMG REP (954-764-8700)

SUPPLEMENTAL INFORMATION

CURRENT CONDITION OF VESSEL/RIG/FACILITY? _____

POB? _____ INJURIES? _____

IS THERE HAZMAT INVOLVED? YES NO MATERIALS: _____

CAN AN MSDS BE PROVIDED ASAP? YES NO

***CURRENT WEATHER CONDITIONS (IF KNOWN)**: WIND_____ SEAS _____SKIES_____

TEMP_____ADDITIONAL:_____

WHAT ASSISTANCE IS CURRENTLY ON SITE OR ENROUTE? ETA? _____

_____

OTHER VESSEL INVOLVED? ITS STATUS? OWNERS? _____

_____

WILL YOU REQUIRE COMMUNICATIONS COORDINATION ON SITE (MCCU)? YES NO

VESSELS COMMUNICATION INFO: PHONE**:_____FAX**:_____***VHF**:_____

***NAME OF VESSEL MASTER**:_____

VESSEL'S LOCAL AGENT**:_____PHONE**:_____

ADDITIONAL INFORMATION:

NATIONAL RESPONSE CORPORATION, 3500 SUNRISE HIGHWAY, SUITE T103, GREAT RIVER, NY 11739
PHONE: 631-224-9141 FAX: 631-224-9082 IOC FAX: 631-224-9086
CORPORATE HEADQUARTERS

NRC FORM # IS - 400NO Rev. 3

NRC Covered Vessels Washington State Contingency Plan

FIELD DOCUMENT

for Washington State Waters (except the Columbia River System)

EVERY SPILL OR THREAT OF A SPILL MUST BE REPORTED
24 Hour Number: 1-631-224-9141 or 1-877-880-4672

NOTICE FOR NRC PLAN COVERED VESSELS:

In accordance with Washington State Law, this FIELD DOCUMENT must be maintained on board the covered vessel and kept in a conspicuous and accessible location while the vessel is in Washington State waters.

This FIELD DOCUMENT must be kept on the navigation bridge and should be filed with any other pollution contingency plan documents for the vessel. As defined in the Plan, a threat of a spill or a "vessel emergency" is a substantial threat of pollution originating from a vessel, including loss or serious degradation of propulsion, steering, means of navigation, primary electrical generating capability, and seakeeping capability.

An Emergency Response Towing Vessel (ERTV) is stationed at Neah Bay available to be hired by vessels experiencing a vessel emergency while in the Strait of Juan de Fuca and off the western coast of Washington State from Cape Flattery Light south to Cape Disappointment Light . ***Call (206) 281 3810 or 1-800-562-2856 to contract this ERTV****.*

OIL SPILL RESPONSE --EMERGENCY PROCEDURES

STOP THE PRODUCT FLOW - Secure pumps and valves

NOTIFICATIONS - Authorized Representative to make REQUIRED NOTIFICATIONS

WARN PERSONNEL - Enforce safety and security measures

SHUT OFF IGNITION SOURCES - Motors, electrical circuits, open flames, etc.

CONTAIN / CONTROL SPILL - Use berms, boom, absorbents

DO NOT use cleaning or dispersing agents on the oil spill. The use of such products is strictly controlled by governmental laws and regulations and will result in fines/penalties.

REQUIRED NOTIFICATIONS: DO NOT DELAY

(NOTE: For spills on Columbia River, Notify MFSA 1-503-220-2055)

NRC: NRC 24 Hour Number 1-631-224-9141 or 1-877-880-4672
Vessel's Qualified Individual: Contact Vessel owner, operator or demise charterer as needed for contact information. This information is also on file with NRC.
US Coast Guard National Response Center: 1-800-424-8802 or 1-202-267-2675
Washington Emergency Management Division: 1-800-258-5990

----------DO NOT DELAY MAKING NOTIFICATIONS----------

FIELD DOCUMENT INITIAL SPILL REPORT

*** NOTE:** It is not necessary to wait for all information before making initial notification.

Reported by (Your name, title, telephone number, or monitored radio frequency):

Vessel name, size, type, country of registry, official number, and call sign:*

Towing Vessel (if applicable): *

Date / time incident: * Date / time reported:* Date / time of next report:

Location of incident: *

Course, speed, and intended track of vessel: *

Type and quantity of oil onboard: *

Estimate of oil discharged; threat of discharge; details of pollution or potential: *

Nature of incident (e.g. grounding, collision, etc.) and extent of defects / damage: *

Weather conditions on scene: *

Actions taken or planned by persons on scene: *

Current condition of vessel: *

Injuries or fatalities: *

Assistance Required:*

Other pertinent information (use extra page if necessary):

.....NOTIFICATION RECORD.....

Date / Time Incident/Case #

_____ ❶ NRC **1-631-224-9141** or **1-800-883-4672** _____

_____ ❷ Vessel Qualified Individual _____

_____ ❸ USCG National Response Center **1-800-424-8802** _____

_____ ❹ WA State WEMD **1-800-258-5990** _____

FIELD DOCUMENT INITIAL SPILL REPORT (continued)

Procedures to Detect, Assess, and Document the Presence and Size of Oil Spill
For Initial Assessment from Vessel Crew

1Type of Oil Product Spilled _____

2. Color of Oil Spill:

- □ Rainbow
- □ Silver
- □ Dark

3. Length of Oil Slick _____ Feet/meters

4. Width of Oil Slick _____ Feet/meters

5. Coverage (% of oil versus water) Within Overall Area of Oil Slick_____ %

6. For overflow discharge, if duration of overboard discharge total time is known, estimate discharge by calculating: Volume loss = pump rate (gallons/barrels/liters per minute) multiplied by elapsed time in minutes:

_____ gallons/barrels/liters

7. For overflow, discharge, or other outflow/escape, as determined by gauging tanks, the amount of oil discharged/lost from vessel in gallons, barrels or liters:

_____ gallons/barrels/liters

8. Has the Spill Source Been Secured? Yes: ____ No: ____

If no, what is the estimated current rate of release? :_____

Sign_____Date_____

Calls by Vessel & QI:

Government/External Notifications			
Contact	Phone Number(s)	Person Notified	Time, Date, & Case ID/Record #
Response Contractor/ WA Vessel Plan SMT (NRC)	(631) 224-9141 or 1-800-883-4672		
Vessel QI			
USCG National Response Center	1-800-424-8802 or (202) 267-2675		
WA Emergency Management Division	1-800-258-5990		

Additional Notifications:

Internal Notifications			
Person to Contact	Phone Number(s)	Person Notified	Time & Date

Response Contractors			
Contact	Phone Number(s)	Person Notified	Time & Date

2.3 NRC INTERNAL PROCEDURES

Immediately upon receipt of an initial spill or threatened spill report to the NRC IOC from a Covered Vessel, the following notifications will be made in this priority:

1. IOC will notify the NRC Plan IC. The NRC Plan IC calls the NRC On-Call Supervisor and other resources as needed.

2. NRC Marine On-Call Supervisor will dispatch response resources as determined by the NRC Plan IC utilizing the notification form in Figure C-1 NRC Internal Response Notifications for guidance.

3. NRC Plan IC will contact Covered Vessel QI and confirm that notifications to USCG and WEMD have been made by QI or Covered Vessel.

The first IOC call is to the Plan IC and the second is to the QI. The IOC will have the contact information for the Plan IC and will provide to the QI along with spill details known at that time. In addition, the IOC will offer to assist the QI in making notifications as/if needed.

The IC's first call will be to the NRC On-Call Supervisor. The second call would be to the QI – or from the QI to the IC. Since the IOC will have given the basic spill info to the QI, the first IC/QI conversation can focus on initial response actions taken and next steps.

The Internal NRC Field Document in Exhibit C provides a summary of internal actions during the initial emergency phase of a response, the NRC Internal Notifications list and the NRC Plan IC Checklist. The following provides additional detail.

The NRC Plan IC will initiate response activities and direct response resources in the initial phase of the response. The Plan IC will liaise so far as practicable with the Client and the QI regarding the response and resource direction. NRC Plan covered clients have authorized the NRC Plan IC to direct the response and directed their QI to coordinate with the Plan IC as soon as possible upon a report of a spill or threatened oil spill from the Covered Vessel.

The NRC Plan IC will represent the Responsible Party and its interests in the spill management team working in the unified command within the incident command system to ensure that all personnel and equipment resources necessary to the response will be called out to clean up the spill safely and to the maximum extent practicable.

The NRC Plan also provides the RP with a SMT located within Washington State to ensure rapid on-scene response. Covered Vessels will also designate their own QI when contracting for NRC Plan coverage. The contact information for each Covered Vessel QI is maintained on the NRC Plan website. The NRC Plan is also structured so that in the event of a spill, the Covered Vessel may transition to their own SMT directed by the QI and approved by the SOSC and FOSC, in which case the NRC Plan SMT members will work with the QI to ensure a smooth transition to Covered Vessel designated SMT.

A Change of Incident Commander form is included in Appendix C to document the transfer of responsibility from one IC to the next IC. Before replacing an active IC and SMT spill management, the RP will also need to satisfy the State and Federal OSCs of their ability to direct (continue) the recovery / cleanup without interruption. If the OSCs have concerns about this ability, the NRC Plan IC / SMT will continue in the ICS on behalf of the RP until the change in ICs is approved.

The NRC Plan IC will use the form *NRC Plan IC Checklist* in Appendix C to document initial actions, including notifications. Based on the spill incident information, the NRC Plan IC will use their best professional judgment to determine the appropriate response resources. Because every incident is different there can really be no hard and fast guidelines on precisely what constitutes “appropriate” response resources. However it is the NRC Plan’s policy to be proactive and to call out any and all resources that may be needed to quickly and effectively deal with the oil spill and then stand this resource down if it is later determined to not be needed.

If the incident circumstances indicate there is sufficient spilled oil such that may be contained and recovered, or the threat of such a spill, then NRC resources will be dispatched to the scene. The exact type and quantity of these resources will be determined on a case by case basis. Factors to be considered when making these decisions include:

- quantity and type of oil released
- whether the source has been controlled
- the total potential release amount
- the extent to which the oil has spread or may spread
- proximity of the spilled oil to environmentally sensitive resources
- wind speed and direction
- stage of the tide and prevailing currents
- clean up and containment actions already taken by the vessel’s crew

In addition to assembling the appropriate resources to contain and recover the spilled oil, the NRC Plan IC will also determine to what extent additional staff are needed to manage the response and if standing up an expanded ICS spill management team is necessary. NRC will respond initially to a spill, then transition to a spill management team or QI as appropriate or as requested by the RP. If an overflight is required, the NRC Marine Operations Manager or designee will mobilize a charter aircraft and conduct the overflight.

If there is a significant threat to natural resources, the NRC Plan IC will call upon contract support from Polaris to work with the state trustee Environmental Unit Leader within the Planning Section. This will ensure environmentally sensitive areas are identified and appropriate priorities are set for protection strategies. Additionally, Polaris support will assist in the coordination of shoreline oiling assessments and the development of appropriate shoreline cleanup methods.

Contractor support from Genwest Systems will be called upon by the NRC Plan IC if there are specific needs for information management support. Genwest information management support may include such tasks as the preparation of situation maps and resource tracking software. Genwest may also be called upon to provide appropriate personnel to staff ICS positions as needed in the Planning or Logistics sections.

In the case of a spill that draws media interest beyond the initial report, the NRC Plan IC may call upon contract support from the NRC Plan designated PIO to draft press releases and coordinate media inquiries.

2.4 OTHER EMERGENCIES

The purpose of the NRC Plan is to provide Covered Vessels with an oil spill response contingency plan and an oil spill emergency response system to so that the Covered Vessel meets its Washington State contingency planning requirements and ensure that response resources will promptly and adequately respond to an oil spill. In the event a Covered Vessel has an emergency other than an oil spill while in Washington waters, the following information is provided to assist the vessel master in dealing with that emergency:

Fires, Explosions, Evacuations, Emergency Access or Exclusion Contact:

- Nearest Coast Guard unit either
    - Via radio: **VHF-FM channel 16** or **HF SSB 2182.0 KHz** or
    - Via telephone:
        - **USCG Sector Puget Sound 1-206-217-6001**
          For emergencies in Puget Sound and along the outer coast, north of the Queets River (Jefferson/Grays Harbor County line).
        - **USCG Sector Columbia River 866-284-6958**
          For emergencies in Grays Harbor, along the outer coast, south of the Queets River, and in the Columbia/Willamette.
- Local fire / police / sheriff departments by calling **911**.
  Remember: the 911 system connects the caller to emergency departments in the local calling area

To control ground traffic or access to the site, local police / sheriff departments can provide emergency services until a more permanent arrangement can be made, e.g. contractual arrangements with a security service / agency.

To control air traffic, contact the appropriate US Coast Guard Sector Command Center noted above. The US Coast Guard will request a Temporary Flight Restriction (TFR) from the Federal Aviation Administration. This TFR will establish specific restricted air space, allowing response support aircraft to enter the area and prohibiting non-essential aircraft.

If during a Covered Vessel emergency a spill occurs or a substantial threat of oil pollution determination is made by the Federal or State OSC, NRC will work within the lead agency command structure as necessary to clean up the spill or mitigate the threat of a spill as requested by the member or lead agency.

3. SPILL RESPONSE ORGANIZATION

Contents

3.1 VESSEL CREW

The vessel captain is in charge of the vessel crew and is responsible for any spill response measures taken before the arrival of the IC and/or response personnel.

In the event of a spill at any location, the captain is notified immediately. The captain then directs the crew in appropriate initial response procedures (Chapter 4) and commences notification procedures (Chapter 2).

Upon arrival of NRC Plan IC and response personnel, on-scene personnel will transfer their responsibilities to the appropriate individuals.

3.2 NRC / RESPONSIBLE PARTY

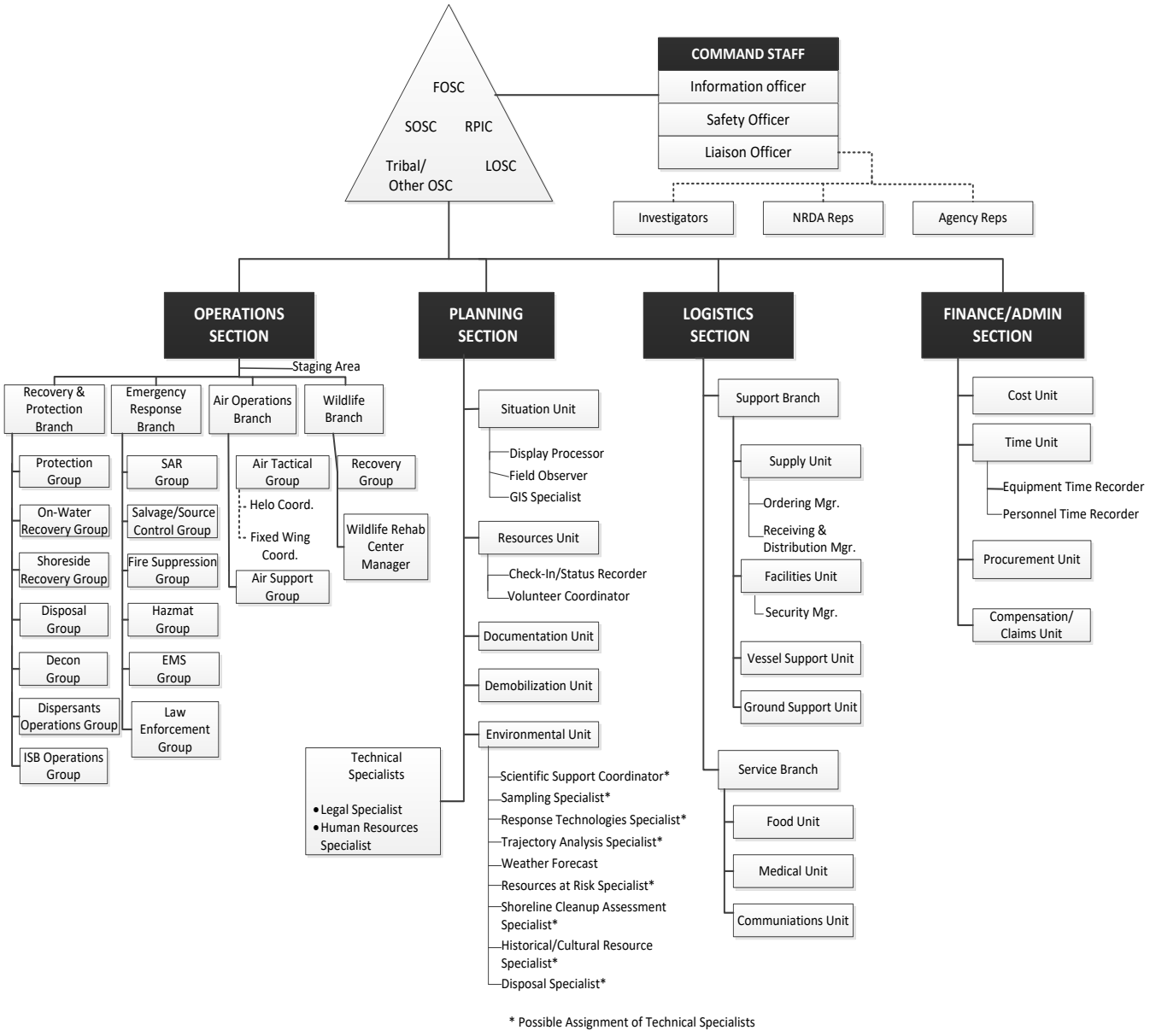
See Section 1.1 for details regarding the establishment, authority and purpose of the NRC Plan, and Section 1.6 regarding the liability and function of the responsible party.

ICS will be used to manage spill response activities conducted under the NRC Plan with a designated NRC Plan Incident Commander acting as the Responsible Party's representative in the Unified Command. NRC will provide personnel to fill ICS positions as defined in the Northwest Area Contingency Plan as required by actual spill response circumstances.

The ICS organization develops around five major functions that are required on any incident whether it is large or small (see Figure 3-1). For some incidents, and in some applications, only a few of the organization's functional elements may be required. However, if there is a need to expand the organization, additional positions exist within the ICS framework to meet virtually any need.

ICS establishes lines of supervisory authority and formal reporting relationships. There is complete unity of command as each position and person within the system has a designated supervisor. Direction and supervision follows established organizational lines at all times.

Figure 3-1 ICS Structure *(from the NWACP, page 2000-3)*



The NRC Plan follows the ICS planning process and ICS position job descriptions as outlined in the Northwest Area Contingency Plan (NWACP). The positions of Environmental Unit Leader, Liaison, Wildlife Branch Director and Information Officer will be staffed according to guidelines set forth in the NWACP. To facilitate implementation of ICS, NRC will use the current referenced Incident Management Handbook, as recommended in the NWACP.

Primary and alternate staffing for the NRC Plan Spill Management Team as required in WAC 173-182-280 is provided in Table 3-1.

Table 3-1 NRC Spill Management Team

ICS Position	Name	Name	Name
Responsible Party Incident Commander	Tracy McKendry	Jerry Popovice	Joe Smith
Public Information Officer	Ryan Dickson	Deborah Wick	Mike Reese
Liaison Officer	Dale Raymond	Zac Doll	Sarai Childs
Safety Officer	Mark Gustin	Jeff Edwards	Ron Browning
Operations Section Chief	Jim Riedel	Jason Potts	Roman Geigle
Planning Section Chief	**Genwest**	**Genwest**	**Genwest**
Logistics Section Chief	Roman Geigle	Erick Chatfield	Zac Doll
Finance Section Chief	Amy Janak	Deana Caputo	Bretta Swensson
Wildlife Branch Director	**Focus Wildlife**		
Air Operations Branch Director	Connor Barnes		
Situation Unit Leader	**Genwest**		
Resources Unit Leader	Erick Chatfield		
Documentation Unit Leader	Cyndee Simmons		
Environmental Unit Leader	**Polaris**		

The NRC Plan IC will initiate response activities and direct response resources in the initial phase of the response. The Plan IC will liaise so far as practicable with the Client and the QI regarding the response and resource direction. NRC Plan covered clients have authorized the NRC Plan IC to direct the response and directed their QI to coordinate with the Plan IC as soon as possible upon a report of a spill or threatened oil spill from the Covered Vessel.

The NRC Plan IC will represent the Responsible Party and its interests in the spill management team working in the unified command within the incident command system to ensure that all personnel and equipment resources necessary to the response will be called out to clean up the spill safely and to the maximum extent practicable until a formal transition occurs from the provider to the Client's designated Qualified Individual (QI) as outlined in the Plan. A Change of Incident Commander form is included in Appendix C to document the transfer of responsibility from one IC to the next IC.

Before replacing an active IC and SMT spill management, the RP will also need to satisfy the State and Federal OSCs of their ability to direct (continue) the recovery / cleanup without interruption. If the OSCs have concerns about this ability, the NRC Plan IC / SMT will continue in the ICS on behalf of the RP until the change in ICs is approved.

Claims Procedures

All NRC Covered Vessels are required to be insured for coverage of claims related to pollution incidents from vessels. Certificates of insurance providing evidence and contact information for the Covered Vessels will be collected as part of the NRC contracting process. In the case of a spill or threatened spill covered under the NRC Plan, the RP will contact their P&I representative to arrange for claims processing as required under their specific P&I policy.

The scope of the Claims process will be dependent on the actual claims potential of each individual spill event. The Finance Section will determine the need for a Compensation/Claims

Unit based on operational information and volume of claims inquiries. The Unit will be activated and staffed as needed to address initial inquiries. The Unit will begin the process of tracking claims requests as submitted. The Unit will be expanded as needed to log and respond to the number of calls received in a timely manner.

The decision on if and/or when a notification about the process for submitting claims to the RP will depend on a variety of factors, which may include the size of the spill and the number of inquiries received concerning potential claims. Legal considerations by the RP may also factor into the timing of releasing claims information. However, in general, the claims information and submittal process will be established and advertised in coordination with the QI as soon as possible after determining there will be an ongoing need for claims coordination beyond any initial direct inquiries.

Notifications about the claims and the claims process will be placed in local newspapers and media. The notification will include contact information provided by the QI, generally including phone, email, mail and a website location to access additional claims information and forms. A "Sample Template for Advertisement for Oil Spill Claims" is provided in Appendix C. Although it is impossible to provide an exact number of claims at which establishing a local claims center would be advisable, a number of 100 calls per day would be a reasonable trigger point at which to consider this option and confer with the RP and its insurer.

Although individual RPs may provide the Compensation/Claims Unit with its own company forms or forms provided by its insurance company for the management of the claims process, sample forms for representative claims procedures are also included in Appendix C. These forms will be used by the Unit on an interim basis until RP provided forms are made available and/or as guidance to ensure that the RP provided forms adequately address the claims process as needed.

Since there can be many different types of claims, the documentation needed by a claimant to prove their claim will vary. In addition, individual insurers may have different documentation requirements. However, as a general guideline for Covered Vessel RPs, information on what might be needed for a Damage Claim and a Loss of Profits or Earning Capacity Claim is included in Exhibit C, "Sample Required Claim Documentation".

3.3 FEDERAL AND STATE ON-SCENE COORDINATORS

The authority and responsibilities of the FOSC are outlined in Section 1.8. The state's roles, responsibility and authority are contained in Section 1.9. The duty of the FOSC is to ensure a safe and adequate response, and to direct federal pollution control activities at the scene of a discharge or potential discharge. The SOSC also has the authority to assume responsibility for a response if the RP isn't acting responsibly. However, the general philosophy is to allow the spiller to clean up the spill, provided there is adequate progress

In the event that an apparent RP refuses responsibility for a spill, the NRC Plan IC will ensure that the appropriate federal and state agencies are informed of this situation. If the situation necessitates FOSC or SOSC assumption of the management of the response, the IC will take actions to transfer all responsibilities to the FOSC or SOSC.

As part of the transfer procedure from NRC to the FOSC or SOSC, all relevant materials, or copies (maps, logs, correspondence, etc.), will be provided to the personnel designated by the

FOSC or SOSC to continue the management of the response. Also, the exact time of transfer must be documented for reference purposes and notification made to all interested parties.

3.4 INCIDENT COMMAND POST

The establishment of an ICP to coordinate spill response activities is primarily dependent upon the location and size of the spill. Small spills, for example, can be managed from a vehicle equipped with a cellular telephone and portable VHF radio.

On the other hand, larger spills might require numerous offices and conference rooms, a separate communications center, kitchen facilities, etc. - all co-located at or near a logistical staging area with dock space and a helicopter landing zone. Depending on the size and location of the spill, suitable ICP spaces may be available at the shoreside facility at the scene of the spill. Other options for an ICP would include local government buildings, hotels, motels, resorts, cabins, schools, park facilities, even private homes.

NRC maintains an Operations Center at 9520 10th Avenue South, Suite 150, Seattle, WA 98108, that could serve as an initial ICP. This Operations Center is capable of accommodating an initial spill management team.

A list of pre-identified potential ICPs is provided in Table 3-2.

Table 3-2 Potential Incident Command Posts

Location	Facility	Telephone	Fax
Aberdeen	Port of Grays Harbor 111 S. Wooding Street Aberdeen, WA 98520	360-533-9528	360 533-9505
Anacortes	Northwest Education Services Dist 1601 R Avenue Anacortes WA 98221	360 299-4000	360 299-4070
Anacortes	Port of Anacortes 1st Street and Commercial Avenue Anacortes, WA 98221	360 293-3134 360 661-5000 (Security)	360 293-9608
Bellingham	Bellingham Best Western Bellingham, WA 98226	360 647-1912	
Ocean Shores	Shilo Inn 707 Ocean Shores Blvd NW, Ocean Shores, WA 98569	360 289-4600	360 289-0355
Ocean Shores	Ocean Shores Convention Ctr. 120 W. Chance A La Mer Ave. Ocean Shores, WA 98569	800 874-6737	
Port Angeles	Vern Burton Center 308 East 4th Street Port Angeles, WA, 98362	360 417-4550 360 457-0411	
Port Angeles	Red Lion Inn 221 N. Lincoln, Port Angeles, WA	360 452-9215	
Seattle	NRCES Offices 9520 10th Avenue South Seattle, WA 98108	206 607-3000	206 607-3001
Seattle	Port of Seattle 2711 Alaskan Way Seattle, WA 98121	206 728-3000	
Tacoma	Fire Training Center 2124 Marshall Ave Tacoma, WA 98421	253-591-5725	
Tacoma	Port of Tacoma 1 Sitcum Way Tacoma, WA 98421	253-383-5841	

If suitable space for an ICP is unavailable or non-existent, trailers, motor homes, camp barges and portable offices can be leased and moved to inaccessible areas within a relatively short period, e.g. 6-12 hours. However, such an arrangement will require additional logistical support such as potable water hauling and storage, chemical toilets with servicing, portable generators and lighting systems, garbage dumpsters, etc.

A spill requiring full mobilization of NRC Plan resources may require:

- A centralized Incident Command Post (large room), with good visibility of operational area highly desirable
- A co-located (but separate) communications center (minimize noise and interference)
- About 24+ telephones and telephone lines
- 1-2 large conference rooms (if equipped with telephones they can also be used as temporary offices for up to four people, each)
- 12+ offices or work spaces with desks or tables (must be shared; more required if not shared)
- Kitchen facilities (coffee pot, refrigerator, microwave oven, etc.)
- A bunk room (4-6 cots) and shower facilities (for short naps and a quick refresher by personnel working in the command center; not for field personnel)

It should be noted that not all Unified Command, SMT and response personnel are required to operate from the ICP. Some can operate from their home office or in the field while making frequent contacts with the ICP.

3.5 STAGING AREA

A staging area is located where incident personnel and equipment are assigned awaiting tactical assignments. There can be multiple staging areas if necessary or appropriate. While there are many advantages to having the ICP co-located near a staging area, there are also several potential drawbacks, e.g. traffic, parking, equipment congestion, noise, etc.

The following should be considered for identifying suitable staging sites:

- Accessibility
    - for vehicles
    - for boats, vessels
    - helicopters
- Docks / piers
    - personnel access (ladders)
    - cranes or davits for lifting
    - tides, currents and wind
- Staging / storage area, covered if possible
- Parking
- Proximity to food and lodging facilities
- Proximity to restrooms and potable water
- Security (ability to limit access)

Depending on the size of the response and the support needed for personnel and equipment deployment, staging areas may be equipped with:

- Portable lighting
- Hand washing units
- Decon stations for personnel and equipment
- Portable showers and changing rooms
- Forklifts
- Small mobile crane
- Covered repair and work shops
- Security

3.6 EQUIPMENT AND SUPPLIES

In the event of an oil spill, the equipment and supplies listed in Table 3-3 may be useful in establishing, operating and maintaining a command, or operations, center. NRC has a mobile command trailer and equipment and supplies that may be utilized for smaller spills with limited ICS personnel or as a forward ICP in larger or remote spill locations.

Table 3-3 Recommended Equipment for Extended Field Operations

EQUIPMENT:

_____ Radio, base station
_____ Radios, portable (with batteries and chargers)
_____ Telephone/s, cellular
_____ Copy machine (with supplies)
_____ Computer, printer, etc. (with supplies)
_____ Camera, photo (with extra film)
_____ Coffee pot (and supplies)
_____ Ice chest (with ice)
_____ Thermos, 5 gallon (water)
_____ Multiple plug power-strip (3 or 4)
_____ Portable generator

OPERATIONS:

_____ Petty cash
_____ Batteries (various)
_____ Flashlights
_____ Calculator
_____ Personnel list
_____ Equipment price list
_____ Charts and maps
_____ Current / tide tables
_____ Road maps (various)
_____ Easel with 2 pads, marking pens
_____ First aid kit
_____ Boat Launch Ramps (book)
_____ Contingency Plan
_____ Geographic Response Plans / maps (for environmental sensitivity)

OFFICE:

_____ Tablets
_____ Pens (various)
_____ Pencils and erasers
_____ Pencil sharpener

_____ Tape - scotch
_____ Tape - masking
_____ Tape - duct
_____ Stapler, staples and puller
_____ Paper clips
_____ Scissors
_____ Telephone message pads
_____ Rulers
_____ Clip boards
_____ Stand-up rack/s (hold folders / books)
_____ File folders
_____ Pocket notebooks
_____ Calendar
_____ Plastic bags (trash)
_____ Time cards and payroll sheets
_____ Log sheets (vessel/ boat/communications/ operations)
_____ Invoices
_____ Accident Reports
_____ Field purchase orders
_____ Advance pay vouchers
_____ Employment application

4. INITIAL RESPONSE ACTIONS

Contents

4.1 SYNOPSIS

When a spill occurs from NRC Plan Covered Vessel, the NRC Plan provides for the prompt, safe and efficient containment, recovery, cleanup / restoration and interim disposal of all oil and oily debris. All Covered Vessels will be contracted directly with NRC for both SMT and PRC services. Therefore, there will be no transition to the RP as the NRC Plan IC will be representing the RP under contract. However, the RP may elect to replace the NRC IC and/or SMT with other contracted SMT personnel as they are available. These Transitions will be orderly and documented on the Responsible Party's Acknowledgement of Transfer form (see Appendix C) and coordinated with the SOSC and FOSC. The NRC Plan IC will also provide the NRC IC Spill Checklist (Appendix C) and the ICS Form 201 to the RP for a thorough transition of actions taken. If a full unified command is in place the transition will be approved by unified command. The RP for the Covered Vessel has full responsibility for the recovery / cleanup operations, subject to federal and / or state approval.

The NRC IOC Watchstander receiving the initial report of spill will complete the

NRC Initial Spill Report form to the extent information is known and available at that time of the initial call. This entails collecting initial spill information which includes:

- Vessel name
- Point of contact information
- Date, time and location of spill
- Amount and type of oil spilled
- Amount of oil in the water
- Whether the source has been secured
- Status of the vessel
- Action(s) taken
- Notifications already made by the vessel

The NRC On-call Supervisor and NRC Plan IC will then be contacted by the NRC IOC Watchstander and this information relayed. If requested by the RP, the IOC Watchstander will also make notifications to the WDEM and/or the USCG National Response Center.

The NRC Plan IC shall confirm the status of the steps taken to ensure safety of the crew and vessel and to mitigate the spill as outlined in the Field Document (Appendix C). The NRC Plan IC shall also use the NRC IC Spill Checklist (Appendix C) to help ensure the proper steps are taken to mount an appropriate response and the ICS Form 201 to document initial response actions and decisions. Pursuant to Covered Vessel contracts, the NRC Plan IC has authority to mobilize any response resources available under the NRC Plan necessary to accomplish these steps.

4.2 PRIORITIES

The following priorities are general guidelines for responding to oil spills that may occur on any NRC Plan Covered Vessel. They are based on the premise that the safety of life is of paramount importance in any pollution incident. The protection of the environment and property, although important, is secondary. Nothing in this part is meant to indicate that higher priority items must be completed before performing a lower priority task. They may be carried out simultaneously or in the most logical sequence for each individual incident.

PRIORITY # 1: SAFETY OF LIFE

The safety of personnel must be given absolute priority. This applies to personnel, including members of the response team. No personnel are to be sent into an affected area without first determining the hazards involved and subsequently, taking adequate precautions.

PRIORITY # 2: SAFETY OF VESSEL, FACILITY AND CARGO

Every effort must be made to secure the safety of the vessel including damage control, corrective stability measures, product transfer, etc. These activities support both, Priority #1, Safety of Life and also Priority #3, Protection of the Environment, with measures that prevent and/or minimize further damage to the environment.

PRIORITY # 3: PROTECTION OF THE ENVIRONMENT - BY:

A. SECURE -- STOP -- THE SOURCE OF THE SPILL

Every effort must be made to secure -- stop -- the source of the spill to prevent further damage. Securing the source is especially critical and should normally be the first line of defense. This is critical.

B. CONTAINMENT AND RECOVERY OF OIL ON OPEN WATER
Must be effected expeditiously to prevent and/or minimize impact to beaches and shorelines.

C. DIVERSION / EXCLUSION BOOMING TECHNIQUES / DAMMING
In the event that the location of the spill or the weather conditions do not permit open water recovery, protection of the shoreline becomes paramount.

NOTE: NRC will utilize the GRPs to determine priorities and strategies to minimize impact on sensitive resources. See Section 6.4 for details.

4.3 SAFETY

Safety of all personnel must be given absolute priority. Adequate safeguards and procedures must be established to protect personnel. Everyone involved in an oil spill response operation is encouraged to promote conditions, practices and attitudes which will enhance this objective.

4.3.1 Legal Requirements

Numerous federal requirements are contained in OSHA and can be found in 29 CFR 1910.120. WISHA regulations regarding Hazardous Waste Operations and Emergency Response can be found in WAC 296-824.

4.3.2 General Site Safety and Hazard Characterization

Before any cleanup operation can begin, it is the responsibility of the Unified Command, response supervisors and all response personnel collectively and/or individually as applicable to determine the hazards present at a spill site. Hazards and safety considerations identified will go into the Site Safety Plan. Safety considerations include:

<u>On-water conditions potentially affecting the operation of response vessels.</u>

This will be assessed taking into consideration sea state, visibility, vessel traffic, rain, fog, snow, etc.

<u>Slips, trips and fall hazards associated with dockside and shoreline clean up.</u>

This will be assessed taking into consideration access to the work area, stage of the tide, work surface (e.g. wet rocks, dock planking), etc.

<u>Hazardous atmospheres in the vicinity of the spilled oil.</u>

This will be assessed by a qualified responder approaching the spill scene from upwind. The atmosphere at the spill scene will then be assessed using an air monitor. Air monitoring will determine the safety of the atmosphere by assessing parameters such as oxygen levels, presence of flammable gases and benzene concentrations. Based on this information they will determine what level of personal protective equipment and safety practices will be required, and what level of safeguards must be instituted. In all cases, this can initially be

facilitated by referencing the MSDS for the particular product that has been spilled, and/or utilizing the services of an industrial hygienist or chemist to determine the oil's volatility or toxicity concentration with regard to the PEL. If test results are above the PEL, site control will be implemented in accordance with 29 CFR 1910.120(d) -- before any cleanup work begins -- to control employee exposure to hazardous substances. This may include requiring workers to wear LEVEL C or higher personal protective equipment and appropriate air-purifying respirators when working in the hazardous atmosphere. Alternatively, responders may be required to delay entry into the hazardous atmosphere until the natural processes (weatherization, evaporation, oxidation, dissolution, dispersion, emulsification or biodegradation) reduce the toxicity level below the PEL.

4.3.3 Air Monitoring

Pursuant to WAC 173-182-535, NRC will implement the following plans for air monitoring to protect oil spill responders and the public:

Initial site safety assessment for responders:

Emergency Response activities are potentially dangerous and may require more stringent safety precautions. Response personnel shall assess and manage these response types on a case-by-case basis. Response personnel shall assess these situations to determine if a threat to life, health, or the environment exists.

Upon arrival of the scene the incident supervisor will:

- Position personnel and vehicles upwind and upgrade.
- Determine the extent of the hazard area.
- Secure the perimeter and deny entry.
- Control ignition sources immediately.
- Designate Hazard Control Zones (Hot, Warm, and Cold Zones)
- Identify and communicate to all personnel operating of the site location of the restricted area.
- Assess the situation and designate an escape route.
- Appoint a Site Safety Manager
- Establish a staging area and appoint a Staging Manager to inventory and control equipment.

After Site Management and Control have been established the site supervisor should do the following to identify the problem:

- Identify, confirm, and verify ALL of the hazardous materials involved in the incident.
- If more than one container is involved.
- Identify all of the properties if the substance(s) involved using available reference material.
- Verify concentrations with flammable gas detection and monitoring instruments.
- If multiple problems exist, prioritize them and make independent assignments.

Evaluate the Hazards and Risks:

- Evaluate health and safety hazards of the products involved. Are other hazardous materials involved.
- Evaluate environmental conditions (ie: wind, precipitation, and topography)
- Monitor the scene to determine the concentrations of contaminates present and their approximate location.
- Compare the resources available vs. the level required to effectively handle the problem. Modifications to the suggested size and perimeters of the hazard control zones may be required.
- Evaluation of the overall incident situation to include:

    - Previous and current status of the incident.
    - Any abnormal conditions observed immediately before the event.
    - Evaluate the overall condition of the incident scene:
    - Based upon the hazard and risk assessment evaluation, determine the manner in which the incident should be handled and evaluate the following concerns

        - Toxicity
        - Flammability
        - Reactivity (of other hazardous materials involved)
        - Physical hazards
        - Chemical properties
        - Exposures

The site/H&S manager may choose to implement a more restrictive PPE policy. Engineered solutions to environmental conditions and experienced staff judgment may be used for unique conditions and situations. PPE shall be utilized if the potential for exposure remains after institution of work practice controls. The following PPE can be utilized:

- safety glasses with side shields, goggles, or equivalent
- foot protection
- protective gloves
- Coveralls (Nomex or FR Cotton)
- compatible chemical protective clothing
- SCBA or respirator with proper cartridge (if trained and qualified for use)

Take immediate action if dangers exist to nearby personnel and property. Keep alert of suspicious activities or behaviors.

<u>Work area air monitoring:</u>

A wide variety of air monitoring instruments and supplies are used for personnel protection. The selection of PPE and the evaluation of possible public and public exposure to hazardous materials requires detailed chemical knowledge and extensive field experience with ambient and working air monitoring equipment and usage. This would be captured on the NRC Emergency Response Health and Safety Form.

Direct instrument measuring capabilities include explosive atmosphere, oxygen, organic vapor, methane, carbon monoxide, hydrogen sulfide, with photo ionization, combustible gas, mercury vapor, and chemical-specific airborne Draeger CMS® and colorimetric tube detection instruments and supplies.

Supervisory personnel and most response technicians are trained in operation of each instrument. Direct instrument measuring capabilities include explosive atmosphere, oxygen, organic vapor, methane, carbon monoxide, hydrogen sulfide, radiation, and mercury concentrations. In addition, NRC maintains capabilities for chemical-specific colorimetric detection systems, and for working exposure air sampling and analysis for assessment by staff industrial hygienists.

Community air monitoring (area wide monitoring):

NRC will utilize Center for Toxicology and Environmental Health (CTEH) for community monitoring (area wide). NRC has an existing and current reciprocal contract with CTEH and would use their 24-hour Emergency Hotline (1-866-869-2834) top activate this resource as necessary.

Air monitoring instruments and detection limits:

Direct instrument measuring capabilities that will be used by responders when monitoring for public safety include explosive atmosphere, oxygen, organic vapor, methane, carbon monoxide, hydrogen sulfide, with photo ionization, combustible gas, mercury vapor, and chemical-specific airborne Draeger CMS® and colorimetric tube detection instruments and supplies.

Detection limits and action levels will be derived from various information points such as, NIOSH, ASTDR, Product Safety Data Sheets (SDS) as well as instrument manufacturers specifications and reference material.

Action levels for various oil constituents of concern:

Below is an example of Action Levels for various oil spill constituents based on products handled (benzene, H2S, etc.). Please note that NRC will utilize NIOSH, ASTDR, Product Safety Data Sheets (SDS), etc. for action level criteria.

Table 4-1 Air Monitoring Action Levels

	Reading	Action
COMBUSTIBLE GAS INDICATOR – LEL (1% = 10,000 ppm)		
Instrument	< 0 - 5% LEL	• Safe from fire hazard • Continue normal operations • Continuous interior monitoring •
	5 – 10% LEL (700 -1400 ppm)	• Safe from fire hazard • Continue normal operations • Assume benzene and high inhalation hazard
	> 10% LEL (1400 ppm)	• Shut down operations • Investigate source of high LEL • Remove liquid • Increase push /pull ventilation until < 10% LEL

COMBUSTIBLE GAS INDICATOR – Oxygen		
Continuously Monitor at multiple levels to detect % oxygen.	19.5 – 23.5 %	• continue push / pull ventilation • Continue normal operations • continue use of Level B /supplied air or C if entry required
	< 19.5 %	• IDLH situation; Level B if entry required
	> 23.5%	• IDLH situation; No entry
Draeger Tubes– Benzene / PID		
Monitor at Breathing Zone levels to detect vapors in air.	< 1 ppm 0 to 20 ppm on PID (set for isobutylene)	• Safe from toxicity hazard • Continue normal operations
	1-15 ppm 20 to 300 ppm on PID	• Continue normal operations • Initiate use of Level C / air purifying if entry required (H2S must be below PEL)
	> 15 ppm > 300 ppm on PID	• Call Safety Manager. 971-285-0450 • Level B if entry required

Data management protocols and reporting time frames to the unified command:

NRC would document all initial air reading on the NRC Emergency Response Health and Safety Form. This would provide immediate data collection during the initial assessment phase of the response to help evaluate responder safety as well as initial public safety.

NRC will utilize CTEH for community monitoring (area wide) data collection and reporting information. NRC has an existing and current reciprocal contract with CTEH and would use their 24-hour Emergency Hotline (1-866-869-2834) top activate this resource, as necessary.

Communication methods to at-risk populations:

NRC will utilize CTEH, which will be working with Unified Command for community outreach. NRC has an existing and current reciprocal contract with CTEH and would use their 24-hour Emergency Hotline (1-866-869-2834) top activate this resource as necessary. Action levels for community exposure are found in Section 9418 of the NWACP and Section 9202 provides guidance for communicating to at-risk populations.

Evacuation zones and shelter-in-place criteria:

NRC with the assistance of CTEH will work with the Incident/Unified Command to develop evacuation or shelter in place criteria. Additionally, published evacuation information like the USDOT Emergency Response Guidebook (ERG) and plume and modeling software such as ALOHA®/ CAMEO® could be utilized to assist the Incident/Unified Command in determining evacuation or shelter in place criteria.

4.3.4 Personal Protective Equipment

Levels of Protection (A-D), from OSHA regulation (29 CFR 1910.120, Appendix B) are summarized in Table 4-1. Response personnel involved in oil spill cleanup operations will comply with all Federal, State and Company safety regulations and policies. All response personnel will use an acceptable level of PPE for their working environment based on the chemical or physical properties of the hazards present.

Table 4-2 Personal Protective Equipment / Levels of Protection: A-D

PERSONAL PROTECTION EQUIPMENT / LEVELS OF PROTECTION: A-D
---FROM OSHA REGULATIONS: 29 CFR 1910.120, APPENDIX B---

CONDITIONS FOR USE	EQUIPMENT (PPE)
LEVEL A: Greatest level of protection for skin, respiratory, and eyes. SHOULD BE USED WHEN: 1. Hazardous substances identified for highest level of protection. * High concentration of atmospheric vapors, gases or particles. * Work functions potential for splash, immersion, or exposure. 2. Substances with a high degree of hazard to skin. 3. Operations being conducted in confined, poorly ventilated area, and not yet determined to de-escalate from Level A.	a. Positive-pressure, full face-piece SCBA. b. Totally encapsulating chemical protective suit. c. Gloves: inner and outer chemical resistant. d. Boots: chemical resistant with steel toe, and shank. * OPTIONAL, as applicable: Coveralls, long underwear, hard hat under suit.
LEVEL B: Highest level of respiratory protection but lesser level for skin protection SHOULD BE USED WHEN: 1. Type and atmospheric concentration identified. 2. Atmosphere contains less than 19.5% oxygen. 3. Presence of incompletely identified substance is indicated by organic vapor detection instrument, but are not suspected of containing high levels of chemicals harmful to skin or easily absorbed.	a. Positive-pressure, full face-piece SCBA. b. Hooded chemical resistant clothing. c. Gloves: inner and outer chemical resistant. d. Boots: chemical resistant, with steel toe and shank. * OPTIONAL, as applicable: Coveralls, boot covers, hard hat, face shield.
LEVEL C: SHOULD BE USED WHEN: 1. Atmospheric contaminants, liquid splashes, or other direct contact will adversely affect or be absorbed through skin. 2. Types of contaminants have been identified, concentrations measured, and an air purifying respirator can remove contaminant. 3. All criteria for use of air purifying respirators are met.	a. Full-face or half-mask air-purifying respirator. b. Hooded chemical resistant clothing. c. Gloves: inner and outer chemical resistant. * OPTIONAL, as applicable: Coveralls, boots (outer), boot covers, hard hat, escape mask, face shield.

LEVEL D: SHOULD BE USED WHEN: 1. Atmosphere contains no known hazard, AND 2. Work functions preclude splashes, immersion, or potential for unexpected inhalation or contact with hazardous levels of any chemicals.	a. Work uniform; used for nuisance contamination. b. Coveralls. c. Boots/shoes: chemical resistant, steel toe and shank. d. Safety glasses. * OPTIONAL, as applicable: Gloves, boots (outer), hard hat, escape mask, face shield.

4.3.5 Decontamination

Decontamination means the removal of hazardous substances from employees and equipment to the extent necessary to preclude the occurrence of foreseeable adverse health effects. All personnel, tools and equipment that have entered the contaminated area (exclusion zone), require decontamination upon leaving the exclusion zone as required in 29 CFR 1910.120.

The site health and safety plan will include a section regarding decontamination. Specific decontamination requirements will be included.

Decontamination areas will be located with the following considerations:

- Downwind from command post (prevailing winds do not blow decon dust /materials into clean zones
- Convenient access for exit from hot zones
- In areas that will minimize exposure of uncontaminated employees or equipment

Every exit from the exclusion zone requires decontamination. The exception is an emergency situation. If an employee is injured, decontaminate to the extent possible given the nature of the injury.

Large equipment such as vessels, skimmers and heavy equipment will be decontaminated by using a steam or hot water wash or by an appropriate detergent wash.

Personnel decontamination will vary from site to site but will always include the following steps:

- Equipment drop
- Outer boots and gloves wash/rinse (step off)
- Outer boots and gloves removal
- Suit wash/rinse/removal
- Inner glove wash/rinse
- Face piece removal, wash/rinse
- Inner glove removal
- Field wash (face, hands)

Personnel assigned to the decontamination process will assist workers and decontaminate equipment and reusable protective gear.

An on-site portable shower facility will be provided whenever necessary. If temperature conditions (freezing) prevent the effective use of water, other effective means (dry decon) shall be provided and used.

During hazardous waste site activities, the Project Manager, Safety Manager or the Site Supervisor will verify that proper decontamination procedures are being followed. Verification of decontamination for personal protective equipment and equipment may be accomplished by direct reading monitoring instruments and/or visual inspection as it is brought out of the contamination reduction zone. In some cases samples may be collected to document that the decontamination effort is effective.

PPE and personal equipment will be decontaminated, cleaned, laundered, maintained or disposed of and replaced as needed to maintain their effectiveness. Clothing or materials that cannot be effectively decontaminated will be disposed of and removed with other contaminated materials. Unauthorized employees shall not remove protective clothing or equipment from change rooms. Potentially contaminated clothing will not be taken home for laundering.

In the event that decontamination is ineffective based upon site samples or biological testing results, the decontamination plan will be redesigned to ensure effectiveness.

4.3.6 Medical Surveillance

Medical surveillance will meet the requirements, including frequency, content and record keeping, contained in 29 CFR 1910.120(f) and RCW 49.17.010, 49.17.050, 49.17.060.

4.3.7 General Safety Requirement

Slips, Trips, and Falls
Slips, trips and falls are the major source of injuries for spill responders. The primary cause is inattention while walking across rocks, boarding boats, walking on boats and/or carrying objects. Footwear with soft, flexible soles that fit well is a must.

Vessel/Water Safety
All vessels must comply with USCG regulations for their size and class. Radio equipment shall be in good working order and compatible with standard operating frequencies. Personnel must wear a USCG approved PFD any time there is a potential to fall into the water. This includes, for example, riding in open boats, moving personnel or transferring equipment (hand-to-hand) between vessels, working over the side of a vessel, working near the edge of docks/piers, or line handling for large vessels. Handling anchors, anchor ropes and lines will be done with care. Common accidents to avoid include dropping an anchor on a foot and catching a hand between boat sides and anchor rope. Extreme care will be exercised when beaching boats due to surf conditions, currents, rocks, etc.

DO NOT:

- Stand up and move around in small boats.
- Overload boat or distribute loads unevenly.
- Decelerate suddenly, allowing the stern wake to overtake and swamp the boat by washing over the transom.

DO:

- Hold on to the boat when underway.
- Wear PFD from boat to boat, and boat to shore.

Air Safety
No one will board or exit any aircraft unless directed by pilot. When entering or exiting a helicopter, walk straight to it from the front or side; never from the rear. The invisible tail rotor has caused most severe injuries. Seat belts are required to be worn at all times. Watch foot placement on pop-out pontoons on helicopters when embarking and disembarking to avoid puncturing the pontoons. Hearing protection should be worn at all times when involved with air operations

Buddy System
The buddy system assures that emergency assistance is always available. Watch each other for signs of overexposure, fatigue or any conditions that pose a potential health and safety issue; make periodic checks of personal protective equipment. How it works:

- Never let buddy out of your sight.
- Always be able to communicate with buddy.
- Talk with and/or observe buddy frequently.

Accidents
All occupational injuries, illness or accidents must be reported to the supervisor. The supervisor has responsibility to investigate all accidents/illness, and make sure corrective action is taken. All work crews should have a first aid kit on site which is to be used for minor cuts, scrapes, etc. If an injury is severe enough to require removal of the employee for medical treatment, the supervisor will notify the incident command center and take appropriate action.

4.3.8 Site Safety Plan

The NWACP, Section 9203, includes a Health and Safety Job Aid for spill response. The Site Specific Safety Plan in this section provides the Safety Officer and ICS personnel a template for safeguarding personnel during the response. NRC maintains an Injury and Illness Prevention Plan that has multiple versions of daily safety tailgate forms for use in the field.

4.4 DETECTION

Detection of a spill occurring is extremely important to the success of any cleanup action. The NRC Plan covers different vessel types with varying vessel operations that could lead to a discharge of oil. The following is a list of actions that a Covered Vessel can take to aid in early detection of a spill:

- Vessels while underway or moored should periodically check the surrounding water for signs of oil.
- Vessel crew members should investigate unexplained petroleum odors.
- When receiving fuel or cargo all crew members should be alert for possible spills using all their senses as applicable.
- High tank level alarms, if installed, could be an indication of a possible overflow and investigated accordingly.
- Any discharge of oil or oily water should be immediately reported and documented in the oil record book as applicable.

The primary method of oil spill detection aboard NRC Plan Covered Vessels will generally be by visual observation. A secondary method of detection would be by smell. Vessels equipped with tank level alarms, overflow alarms, or other indicating devices, would use

them to detect a possible spill and investigate alarm conditions accordingly. When a spill or threat of spill is detected, it should be promptly reported to NRC.

4.5 ASSESSMENT

Accurate assessment of the spill and surrounding circumstances is essential to initiating an appropriate response. The NRC IC should utilize the NRC Plan IC Checklist (Appendix C) as a guide to their assessment. During the response the NRC IC will provide an updated report if the initial report significantly changes. See Appendix C for "Procedures to Detect, Assess, and Document the Presence and Size of Oil Spill For Initial Assessment from Vessel Crew."

4.5.1 Importance of Determining Spill Volume and Movement

An important part of handling any oil spill response action is assessing the volume and direction of movement of the spill. An estimate of the oil spill volume allows response teams to determine both the type and quantity of equipment, and labor, necessary to recover the spilled oil.

In larger off-shore and / or coastal spills, tracking and forecasting the spill movement allows response teams the time to plan their recovery strategies as well as protect environmentally sensitive areas.

It is the policy of the Northwest Area Committee that the response to a spill incident should be promptly "ramped up" to provide adequate equipment and trained personnel to effectively respond to the highest quantity of product which will most likely be released. If it is determined that excessive response resources are ordered or mustered they may be canceled or demobilized to help control the cost of the response action to the RP and responding agencies.

4.5.2 Spill Categorization

Inland waters are waters of the U.S. that are not subject to the tidal ebb and flow. From a federal standpoint, such areas are usually under the jurisdiction of the U.S. EPA. In inland water areas, spills are generally categorized as follows:

- Minor Spill: A spill or discharge of oil of less than 24 bbls (1,000 gallons)
- Medium Spill: A spill or discharge of oil of 24 bbls (1,000 gallons) to 240 bbls (10,000 gallons) or a discharge of any quantity that poses a threat to public health and welfare
- Major Spill: A spill or discharge of oil of more than 240 bbls (10,000 gallons) or the discharge of any quantity that poses a substantial threat to public health and welfare

Coastal waters are the navigable waters of the U.S. that are subject to the ebb and flow of the tide. From a federal standpoint, such areas are usually under the jurisdiction of the U.S. Coast Guard. In coastal waters, spills are generally categorized as follows:

- Minor Spill: A spill or discharge of oil of less than 240 bbls (10,000 gallons)
- Medium Spill: A spill or discharge of oil of 240 bbls (10,000 gallons) to 2400 bbls (100,000 gallons) or a discharge of any quantity that poses a threat to public health and welfare
- Major Spill: A spill or discharge of oil of more than 2400 bbls (100,000 gallons) or the discharge of any quantity that poses a substantial threat to public health and welfare

A minor spill may and should be elevated to the category of medium or major spill at the discretion of the FOSC/SOSC if any of the following apply:

- Occurs in endangered critical water areas
- Generates critical public concern
- Becomes the focus of an enforcement action
- Poses a threat to public health and welfare

When one or more of these factors exists, it may be appropriate to "ramp-up", i.e., increase, response actions.

4.5.3 Surveillance / Tracking

Visual observation from aircraft, particularly helicopters, is essential for spill tracking and operations planning. To the extent practical, this will be the primary means to locate and track the spilled oil. During periods of low visibility, tracking can also be supported by aircraft equipped with Forward Looking Airborne Radar (FLAR) or personnel with handheld Forward Looking Infra Red (FLIR) or infrared and ultraviolet sensors / cameras.

LOIs for companies providing aerial support are listed in Appendix D, Special Services. Pursuant to WAC 173-182-321 (2), NRC provides complete details of available aerial resources, both under contract and LOI, that may be available for activities such as spill tracking, guiding enhanced skimming and supporting shoreline cleaning operations, in its PRC Application.

Tracking of an oil slick can also be done using a specially designed and transponder equipped "tracking buoy." These buoys are designed to move with the wind and current similar to the movement of oil on water and produce an electronic signal that provides location information.

Alternatively, “low tech” approaches to tracking oil slick may utilize buoys equipped with radar reflectors or flagging that can be deployed and tracked from vessels. During night or low visibility conditions, the radar reflector on the buoys may be tracked using vessel radar to help enhance recovery and protection strategy effectiveness. Tracking buoys with flagging will require clear weather with good visibility to be used as an effective means of tracking the oil slick.

An even simpler method of tracking oil that may be effective to track movement of small spills in a more contained setting would be to use sorbent pads deployed at the leading edge of a slick. These pads should move largely by the current alone and will likely stay in the spilled oil. This is a quick and easy method that may enhance the ability of the responders to identify and track the leading edge of the spill.

4.5.4 Estimating Spill Volumes

Estimating spill volumes is an essential element of any response. The estimated spill volume helps to scale the response. However, caution is advised since the initial reported release volume is often incorrect and is therefore not to be taken as a totally reliable or accurate estimation of spill volume. Where possible, accurate means to assess and quantify the amount lost should be sought.

Direct contact with the vessel captain to obtain detailed information on their estimated amount spilled is recommended. Additionally, information on the circumstances surrounding the spill as well as the total spill potential volume should be obtained and factor into a determination of the actual or potential spill amount.

It is best to be conservative (assume the worst) when scaling the response. It is always prudent to rely more on the extent of oil observed to have been released, responding accordingly, rather than to scale the response based solely on the initial reports or estimates of oil released.

Typically USCG and Ecology investigators will work with the vessel captain and owner to identify the source of a spill and estimate spill volumes.

Table 4-3 Estimating Oil Spill Volume

Volume of a spill can also be roughly estimated based on slick size and color using the following standards based on visual observation:

Standard Term Appearance	Approximate Layer Thickness (Inches)	Estimated Volume (gallons/sq. mile)
Barely Visible: Barely visible in favorable light conditions	0.0000016	5
Silvery: Visible as silvery sheen on the surface	0.000003	10
Slightly Colored: First trace of color observed	0.000006	20
Brightly Colored: Bands of color are visible	0.000012	42
Dull: Color predominantly dull brown	0.00004	125
Dark: Dark brown	0.00012	380
Note: Estimating volume of an oil spill by color and size is extremely rough; however estimates can be used to generate approximate figures for planning purposes.		

4.5.5 Oil Slick Movement

Movement of an oil slick is dependent on the physical characteristics of the oil, the predominant surface currents, wind direction and velocity. Surface currents will dominate spill movement unless winds are strong. However, wind will cause an oil slick to move at approximately 3% of the wind speed. Slick spreading will dictate spill movement only when very close to the point of release.

The on-scene wind and current information may be obtained from a reliable source such as the master of the vessel, terminal operators, or from a spill response vessel. Wind and current information may also be obtained via the NOAA web sites or from the NOAA SSC.

The NOAA SSC also provides computer modeled oil spill trajectory information in response to a spill. This model is the General NOAA Operational Modeling Environment (GNOME).
This model predicts how an oil spill will spread and move within a local area taking into account the following:

- the bathymetry and shoreline configuration of a particular body of water, including its channels, bays, and significant rivers
- currents and winds
- shoreline characteristics that determine beaching and refloating of oil

Trajectories typically should encompass forecasts for 6, 12, 24, 36, and 48 hours as part of the initial response. Oil spill trajectories may be obtained from the NOAA SSC by requesting them through the USCG FOSC.

Prediction of oil slick movement in an actual spill situation may also be accomplished by vector analysis of the two main forces that influence open water oil slick movement: surface currents and winds (FIGURE 4-1).

STEPS: How to use SLICK PREDICTION BY VECTOR ANALYSIS

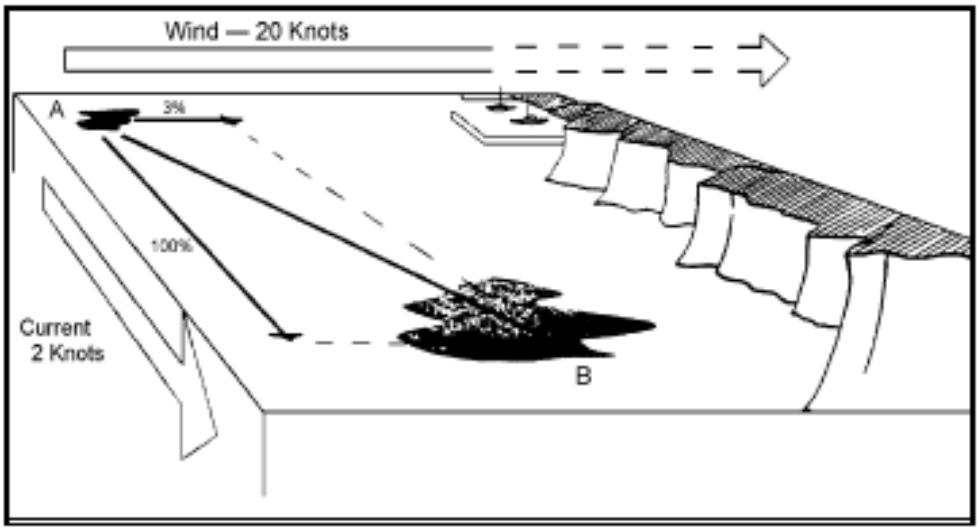
1. Ascertain the direction and speed of both surface water currents and the wind.

2. Next, draw ocean current and wind component vectors showing their relative directions and lengths. The velocity of the current and wind is represented by the length of the vector.

3. Draw a line parallel to the wind vector starting from the tip of the current vector and measuring the exact length of the wind vector.

4. Draw a line from the point of origin to the tip of the parallel wind vector line. The final line is the resultant vector that gives the direction and speed of the slick movement. The direction can be measured with a protractor. The speed is determined by measuring the length of the resultant vector relative to the scale in use.

Figure 4-1 Slick Prediction by Vector Analysis



4.5.6 Oil Spill Behavior

The term "oil" is applied to a wide variety of petroleum and non-petroleum products ranging from crude oils to vegetable oil and different grades of refined products derived from both sources. Crude oil is not a uniform substance and its properties vary widely from one location of origin to another. Oil spill behavior is a function of the oil's physical and chemical properties which include:

- Density
- Viscosity
- Pour point
- Flash point
- Solubility in water

The rates at which oil spreads, evaporates, and breaks down into the environment are all influenced by the processes of oxidation, dissolution, dispersion, emulsification and biodegradation. These processes over a period of days and / or weeks will alter the characteristics of spilled oil; thus, sometimes requiring a change in oil recovery equipment. However, in most cases, these processes aid in the cleanup operation by reducing the volume spilled. Weathering processes also reduce the toxicity of spilled oil, reducing its impact on the environment.

The NOAA ADIOS II model can be used to assess a mass balance and fate for spilled oil on water. Users select from a range of oil types, input spill and environmental conditions, and obtain results of oil loss through evaporation, dispersion, and dissolution. For some oils, estimates of oil emulsification are also provided. These criteria are used to communicate estimated spill mass balance, as recorded on ICS 209 forms (see also Section 7.11, Model Disposal Plan). The physical properties of oil will vary depending on local environmental conditions. The methods for dealing with the weathering spilled oil should be based on field observations.

5. RESPONSE CAPABILITIES

Contents

5.1 INTRODUCTION

The purpose of this chapter is to provide an overview of the response capabilities of NRC that address planning standards issued in WAC 173-182 (2013) for specific planning areas (Figure 5-1). This chapter provides indications of mobilization times, spill response equipment and support available for regional and cascaded response, and cross references to the NRC PRC application.

5.2 MOBILIZATION AND TRAVEL

NRC provides in-state response personnel and equipment for rapid activation and mobilization to NRC Plan covered locations in Washington. NRC SMT personnel are located in the Puget Sound region and are available to mobilize within 1 hour for response. Primary and alternate staffing for the NRC Plan ICS Command Staff and Planning, Operations, Logistics and Finance Sections, including Chiefs and Branch, Group and/or Unit leaders are provided in Table 3-1.

The NRC Plan provides Covered Vessels with spill response capabilities from NRC which is a Washington State approved PRC.

Response times can be estimated from equipment locations to response areas using mileages and speed-time-distance tables (Figure 5-2 and Table 5-1). Spill response resources maintained by NRC include readily mobile systems, either on water (response vessels) or on trailers for immediate mobilization.

For the purposes of estimating response time of NRC resources, the following alternative speeds over water have been approved by Ecology:

- 25 knots for Fast Response Vessels (FRVs)
- 10 knots for the OSRV Cape Flattery, OSRV Columbia
- 8.75 knots for OSRV Ironwood
- 6 knots for the Island Viking towing the barge Kenny

The alternative travel speeds for these vessels are based on actual vessel movements documented by NRC. Records with details of these vessel movements and times have been submitted to Ecology. For planning purposes, the over water travel speeds of the other NRC vessels would be 5 knots and the travel speeds of equipment over land is assumed to be 35 miles per hour, as per the planning standard (WAC 173-182-350 (4)).

Figure 5-1 Geographic Areas for OSR Planning Standards (highlighted in orange)

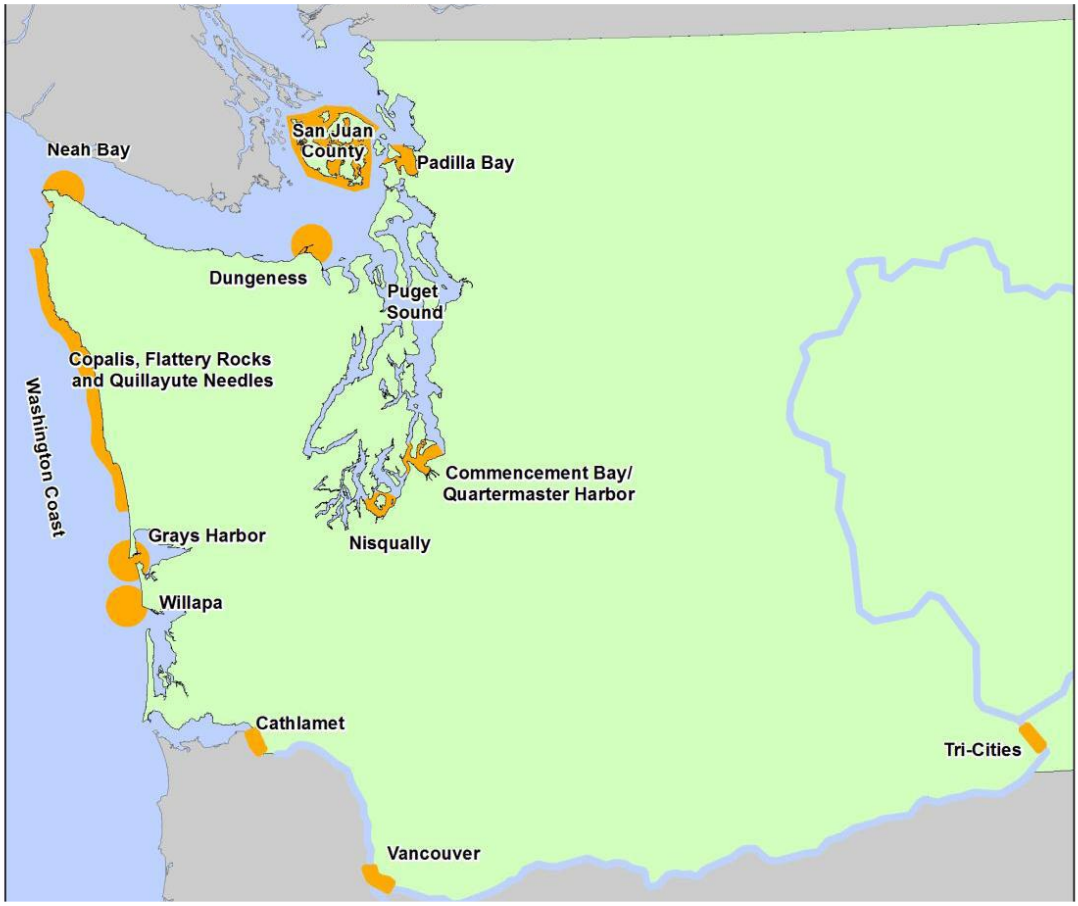


Table 5-1 Distances (nautical miles) for locations in Puget Sound

	ANACORTES	BELLINGHAM	BOUNDARY (RS)	BOUNDARY (LK)	EVERETT	FERNDALE (1)	MARCH POINT	MUKILTEO	OLYMPIA	POINT WELLS	PORT ANGELES	PORT GAMBLE	PORT TOWNSEND	SEATTLE
BELLINGHAM	18													
BOUNDARY (RS)	44 ½	45½												
BOUNDARY (LK)														
EVERETT	61	74	99½	59½										
FERNDALE (1)	22	23½	25½		78									
MARCH POINT	2½		47		63									
MUKILTEO	57½	70½	96½	56½	3½	74½								
OLYMPIA	116½	129½	155	115		133½	118½							
POINT WELLS	57	70	96	56	15	74	59	12½						
PORT ANGELES	43½	56½	82	30	62	60½	45½	59	118	58½				
PORT GAMBLE	49½	62½	88½	48½	26½	67	51½			21	51			
PORT TOWNSEND	29				34½		31½	31	90	36½	35½	23		
SEATTLE	71	84	110	70	29½	88		25½	51½	13½	72½	33½	44½	
TACOMA	91½	104½	130½	90½	50	108½			36½	33½	93½	53½	65	27½

(RS) Rosario Straits, (LK) Lime Kiln Point, Ferndale (1) is midway between BP and Phillips66 Terminals.

5.3 GENERAL CAPABILITIES

General capabilities to provide oil spill response capabilities for vessels of opportunity, aerial surveillance, Group 5 oils, dispersants application, in-situ burning, storage, technical manuals and the emergency response towing vessel are discussed in the following.

5.3.1 Vessels of Opportunity (VOO)

WAC 173-182-317 Covered Vessel Planning standards for vessels of opportunity.

NRC provides Vessels of Opportunity (VOO) resources through the NRC VOO Program as described in the NRC PRC Application pursuant to the requirements for Regions 1-6. This includes the list of NRC Region 1-6 VOOs, VOO training requirements and mobilization procedures. NRC is committed to calling out NRC VOO Program participants to support booming, recovery and/or logistical support as appropriate and to VOO participation in drills specific to the tactics the VOO may support.

The NRC VOO program administrator maintains the list of NRC VOO participants including contact information and makes available to on-duty supervisors and response manager. VOOs will be contacted as needed for emergency response by the NRC VOO program administrator, on-duty supervisor or response manager. Vessels in the NRC VOO program are also entered into the Ecology VOO database. NRC verifies VOO participant database information on an annual basis. NRC VOO contracts, training records and materials are maintained in the NRC Seattle office by the VOO program administrator and made available to Ecology upon request.

5.3.2 Aerial Surveillance

WAC 173-182-321 Covered Vessel Planning Standards for Aerial Surveillance

NRC provides Aerial Surveillance equipment and capabilities to meet six (6) and twelve (12) hour planning requirements as described in detail in the NRC PRC Application. In the event that other aerial assets are needed, NRC has access to additional resources through the as available aircraft and/or UAV operator companies identified in the NRC PRC Application.

NRC Observation Personnel are trained in:

- ASTM assessment techniques – "Standard Practice for Reporting Visual Observations of Oil on Water"
- Expertise in the estimation of slick size, thickness, and quantity
- NOAA's "Open Water Oil Identification Job Aid for Aerial Observation"
- NOAA's "Characteristic Coastal Habitats" guide

NRC Aerial Observers are also:

- Capable of supporting oil spill removal operations continuously for three 10-hour operational periods during the initial 72 hours of the discharge
- Trained in Aerial Oil Surveillance Training provided by U.S. Coast Guard (USCG) D13 – District Response Advisory Team (DRAT)

NRC also has access to over 70 Spotter Aircraft throughout the United States at 48 different aircraft staging bases. All aircraft staging bases meet the specifics of individual NRC contracted aircraft requirements, including runway composition, runway length and optimal proximity to possible spill event sites.

See the NRC PRC Application for more detailed information about aerial surveillance capabilities and resources available through NRC and its vendors and subcontractors.

5.3.3 Non-Floating Oils

WAC 173-182-324 Planning Standards for Non-Floating Oils

NRC WA Plan utilizes its PRC to provide response resources for Non-Floating Oils. See the NRC PRC Application for more detailed information about Non-Floating Oils capabilities and resources available through NRC and its vendors and subcontractors.

NRC Covered Vessels handle several products, which, based on their physical and chemical properties, and/or the properties of the water bodies they may spill into, have the potential to sink or submerge. Refer to Table 1-2 for the types of products that could be carried by Covered Vessels with the potential to be non-floating oils.

Contracted Resources for NFO Spills

NRC WA Plan utilizes NRC, its approved Primary Response Contractors (PRC) with the state of Washington and the U.S. Coast Guard, to provide the necessary personnel and equipment (see NRC's PRC application and WRRL as appropriate) capable of responding to an oil spill within the time frames outlined in Table 5-3 to meet this regulatory requirement of WAC 173-182-

324(2). NRC will aggressively respond to floating oil, will, and will prepare for detection, delineation, and recovery of non-floating oil if necessary.

NFO Assessment

There are many important ways that a floating oil spill response differs from an NFO spill response, including the personnel, equipment, and tactics that will be used to respond to the spill. Because of these differences, it is important to determine early on whether a spilled product has the potential to sink or submerge.

Within the first hour of a spill, NRC personnel will conduct an initial assessment of the characteristics of the spilled product, and the characteristics of the waterbody it spilled into (using Attachment A of section 9412.A2 in the NWACP). If available at the time, we will consult with available response partners including our PRC, the environmental unit, NOAA SSC, and other company resources to determine if there is a potential for the oil to sink or submerge. If the potential exists, we will begin to mobilize the equipment and personnel necessary to respond. If we do not immediately observe a potential to sink or submerge, we commit to reevaluating the potential as the response evolves.

Table 5-2 – Timetable for NFO Response Resources

Time	Capability
1 hour	**Assessment:** NRC will initiate an assessment regarding the potential for the spilled oil to submerge or sink which may include environmental factors (i.e., density of the receiving water, the chemical properties of the oil released, or other indicators) to begin a non-floating oil (NFO) assessment to identify the need for personnel and equipment mobilization if it will be needed during the cleanup effort.
6-12 hours	**Detection and Delineation:** Should the assessment and consultation determine that the oil may become an NFO, the following PRC resources and personnel to detect and delineate the spilled oil could have arrived on scene: side scan sonar, multibeam sonar, laser fluorosensors, induced polarization system, divers, remotely operated vehicles, and/or other methods to locate the oil on the bottom or suspended in the water column. Additionally, containment boom, sorbent boom, silt curtains, or other methods for containing the oil that may remain floating on the surface, or to reduce spreading on the bottom, could have arrived.
12-24 hours	**Sampling:** NRC resources and personnel necessary to assess the impact of the spilled oil on the environment could have arrived. Types of resources that may be used for this purpose include sampling equipment. **Recovery:** Additionally, dredges, submersible pumps, sorbents, agitators, or other equipment necessary to recover oil from the bottom and shoreline could have arrived.

Tools for an NFO response

The Pacific Northwest response community has developed response resources and tools to support spills from NFOs. Available resources/tools that NRC WA Plan Covered Vessels and NRC may reference in the event of a spill include:

- NWACP Section 9412– Non-floating Oils Response Tools

- Geographic Response Plans (GRP) sections including the Non-floating Oils Response Options and Considerations Tool and the updated Resources at Risk information which details resources in the water column and seafloor at risk from NFO releases

- Additional response resources are located in the Sector Puget Sound Area Contingency Plan

- uSCAT Technical Reference Manual

- Sunken Oil Detection and Recovery, American Petroleum Institute Technical Reports (1154-1, and 1154-2)

NRC will follow the above resource guidelines for detecting, delineating, and recovering non-floating oils, as applicable.

5.3.4 Dispersants

WAC 173-182-325 Planning standards for dispersants.

NRC acknowledges and will follow the specific guidelines, policy, authorization procedures (including application for dispersant use) as provided in Section 9406 of the NWACP. It is the policy of the Northwest Area Committee that SMART protocols would be followed to monitor and document dispersant application and effectiveness. NRC has planned for the use of dispersants utilizing its inventory of Nalco Corexit 9500A housed in Seattle and Portland. NRC is also committed to monitor dispersant effectiveness. Figure 5-2 provides the Region 10 RRT Dispersant Pre-approval Area Map. Specific dispersant planning standards for representative NRC Plan Covered Vessels are summarized in Table 5-2.
Aerial surveillance aircraft would be used to monitor application with possible monitoring support from vessels operating in the area. The NWACP Dispersant Use Zone Summary is as follows:

Dispersant Pre- Approval Zone

- Marine waters 3 to 200 nautical miles from the coastline or an island shoreline except for waters designated as a part of a National Marine Sanctuary and the Makah Tribe Usual and Accustom marine area or waters within three miles of the border of the Country of Canada, or the State of California.

Dispersant Case-by-Case Approval Zone

- All Marine waters that are both within 3 nautical miles from the coastline or an island shoreline and greater than 10 fathoms (60 feet) in depth
- Waters designated as a part of a National Marine Sanctuary and waters that are part of the Makah Tribe Usual and Accustom marine area which are also greater than 10 fathoms (60 feet) in depth
- The Strait of Juan de Fuca and North Puget Sound from Point Wilson to Admiralty Head and north, and greater than 10 fathoms (60 feet) in depth.

- Marine waters within 3 miles of the borders of the State of California, Makah Tribe Usual and Accustom marine area, and the country of Canada

No Dispersant Use Zones

- Marine waters that are both less than three nautical miles from the coastline and less than or equal to 10 fathoms (60 feet) in depth
- Marine waters south of a line drawn between Point Wilson (48º 08' 41" N, 122º45' 19" W) and Admiralty Head (48º 09' 20" N, 122 40' 70" W)
- Freshwater environments

Figure 5-2 Region 10 RRT Dispersant Pre-approval Area Map

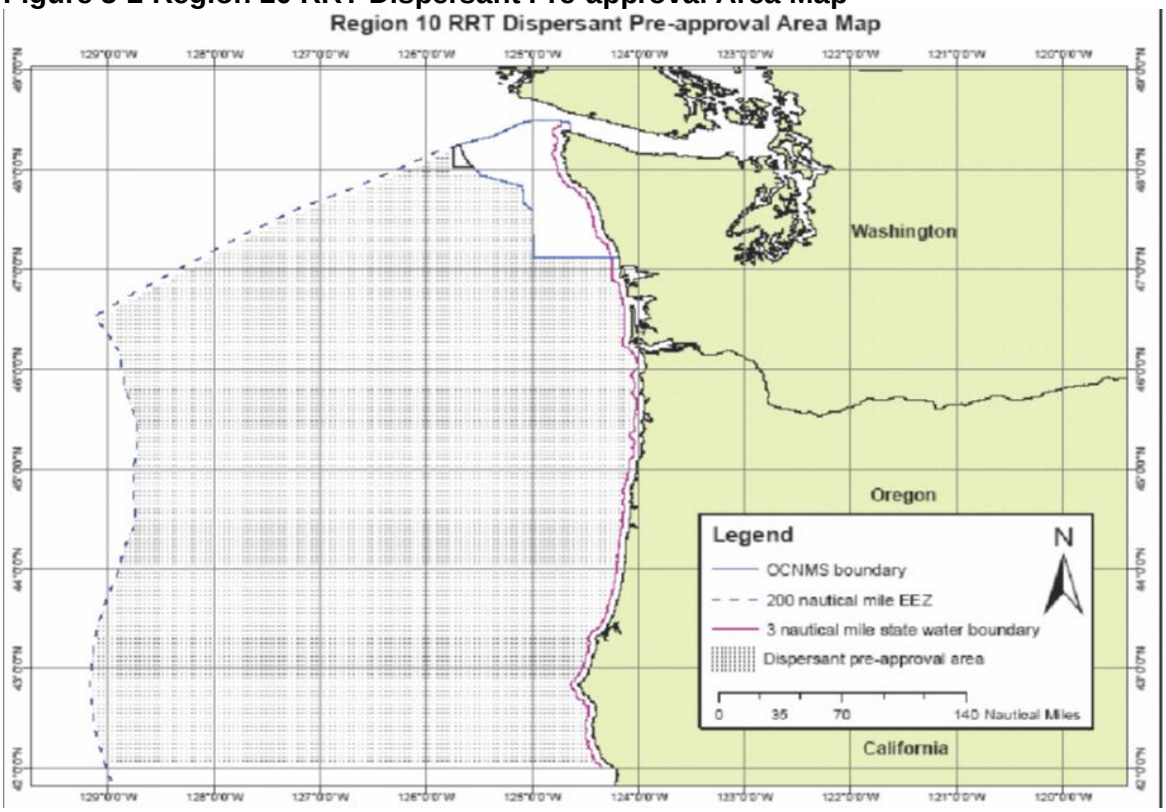


Table 5-3 Dispersant Planning Standards for NRC Covered Vessels

Covered Vessel Type	Operating Area	WCS Volume (bbl)	Planned Dispersant Volume (bbl)
Tanker	Outer Coast, SJD, N. Puset Sound	100,000	Assume 1:20 application; based on treating 5,000bbl/day (cap) = 250 bbl/day
Fishing Vessel	All WA Marine Waters	9,000 to 10,000	Dispersant application not likely because most carry non-persistent diesel as fuel
Cargo Vessel	All WA Marine Waters	100,000	Assume 1:20 application; based on treating 5,000bbl/day (cap) = 250 bbl/day

See the NRC PRC Application for more detailed information about dispersant capabilities and resources available through NRC and its vendors and subcontractors.

5.3.5 In Situ Burning (ISB)

WAC 173-182-330 Planning Standards for In-Situ Burning

Under conditions of the NWACP, Sections 4617-4619 and 9407, ISB is considered a viable response option provided criteria regarding oil properties, environmental conditions, and risk assessment are met. The NWACP states:

> "While no geographic areas have been excluded from the consideration to use in-situ burning, it is very unlikely that it would be approved in a heavily populated area such as inner Puget Sound because of the increased potential for exposing people to high levels of particulates. However, even in highly populated areas, burning may still be approved in unique circumstances, especially when the volatiles from the unburned oil pose a serious threat to human health."

Under the NWACP, ISB is pre-approved for use in those areas which are more than 3 miles from population. The use of ISB in all other areas is to be decided on a case-by-case basis. In-Situ Burn (ISB) use decisions will be conducted following the policies in the Northwest Area Plan (NWACP) located at http://www.rrt10nwac.com/nwacp/ and the NWACP In-Situ Burning Policy Map located at:
https://waecy.maps.arcgis.com/apps/webappviewer/index.html?id=13a6c63a1f9a438583726292e0adb816

A primary consideration in the decision to burn is the protection and safety of human life. The authority to approve a burn rests with the Unified Command, who must determine that an application to burn conforms to the NWACP guidelines. The decision to burn or not burn must be made expeditiously. Specific guidelines, policy, authorization procedures (including application for ISB) are provided in the NWACP. SMART Protocols typically would be followed to monitor and document ISB application and effectiveness. See the NRC PRC Application for more detailed information about ISB capabilities and resources available through NRC and its vendors and subcontractors.

5.3.6 Storage

WAC 173-182-335 Planning Standards for Storage

NRC meets the recovered oil and oily waste storage requirements through several sources:

1. NRC equipment includes storage barges, shallow water barges and bladders (see Section 5.4, below)

2. In order to meet the requirements of WAC 173-182-335 for dedicated on-water storage available within 24-hours, NRC has chartered the Kenny, a 30,783 Barrel tank barge moored Port Angeles, WA. The barge will be towed by the Island Viking at the alternate speed of 8 knots. NRC has also added four (4) Shallow Water Barge sets – two (2) in

Portland, one (1) in Seattle and one (1) in Grays Harbor – which provide a total of 952 barrels additional on-water storage.

3. NRC LOIs with tank barge operators committing to provide barges for temporary storage on an as available basis

4. On-shore temporary storage capabilities resources through LOIs with frac tanks and/or with facilities transferring oil to/from a Covered Vessel.

NRC storage equipment information is available in the Western Response Resource List, available on-line at www.wrrl.us/index.html.

NRC has access to more than 35 barges of opportunity with varying storage capacities that operate in Washington State (see Appendix B for LOIs, list of contact information for initiating deployment in case of a spill and barge capacity spreadsheet). Barges of opportunity will be mobilized as needed through direct phone request from NRC to the relevant operator(s).

NRC also has access to shoreside storage through LOI agreements. Mobile storage tanks can be deployed to locations throughout Washington State. Approximately 1 million gallons of portable land-based storage is available from Baker Tanks in Washington and another 1 million in Oregon, within 24 hours of notification. An additional 200,000 bbls of shoreside storage could be available in Aberdeen, WA through the LOI between NRC and REG (see Appendix B).

5.3.7 Technical Manuals

WAC 173-182-349 Covered Vessel Plan Holders Technical Manuals

Approved NRC Technical Manuals are on file with Ecology and can be accessed at the following links:

San Juan Islands:
https://fortress.wa.gov/ecy/ezshare/sppr/Preparedness/TechnicalManuals/NRC_SanJuanIslands_TechnicalManual.pdf

Neah Bay:
https://fortress.wa.gov/ecy/ezshare/sppr/Preparedness/TechnicalManuals/NRC_NeahBay_TechnicalManual.pdf

5.3.8 Neah Bay Emergency Response Towing Vessel (ERTV)

The Neah Bay Emergency Response Towing Vessel (ERTV) is stationed at Neah Bay and available to respond to vessel emergencies. For information and description of the ERTV, see Appendix E of this Plan.

5.3.9 Shoreline Cleanup

WAC 173-182-349 Covered Vessel Planning Standards for Shoreline Cleanup

As described in detail in the NRC PRC Application and on the WRRL, as well as in 6.8 Shoreline Cleanup, NRC the capability to provide shoreline clean-up within 24 hours as well as to support 14 additional days of shoreline clean-up.

5.4 PRIMARY RESPONSE CONTRACTOR APPLICATION

5.4.1 PRC Application

The NRC Plan utilizes NRC to meet all Washington State contingency plan spill response requirements for Covered Vessels. NRC maintains an approved PRC application with Ecology. See Figure 5.5 Primary Response Contractor Certification for details. See the NRC PRC Application for further details on capabilities and services. A complete listing of NRC response equipment can be found on the WRRL at http://www.wrrl.world/.

Figure 5-3 Primary Response Contractor Certification

NRC

REPUBLIC SERVICES

February 2024

PRIMARY RESPONSE CONTRACTOR CERTIFICATION

This letter confirms that National Response Corporation (NRC) has a Provision of Response Resources Agreement (Agreement) in place with all vessels covered by the NRC Covered Vessels Washington State Contingency Plan (NRC WA Plan). Covered Vessels are authorized to rely upon NRC response capabilities as outlined in NRC's PRC Application and the NRC WA Plan pursuant to terms and conditions of the Agreement. Copies of individual Covered Vessel Agreements are available for review upon request.

If you have any questions regarding this certification, please contact me either by phone at 646-335-2669 or by email at rmccoy@republicservices.com

Sincerely,

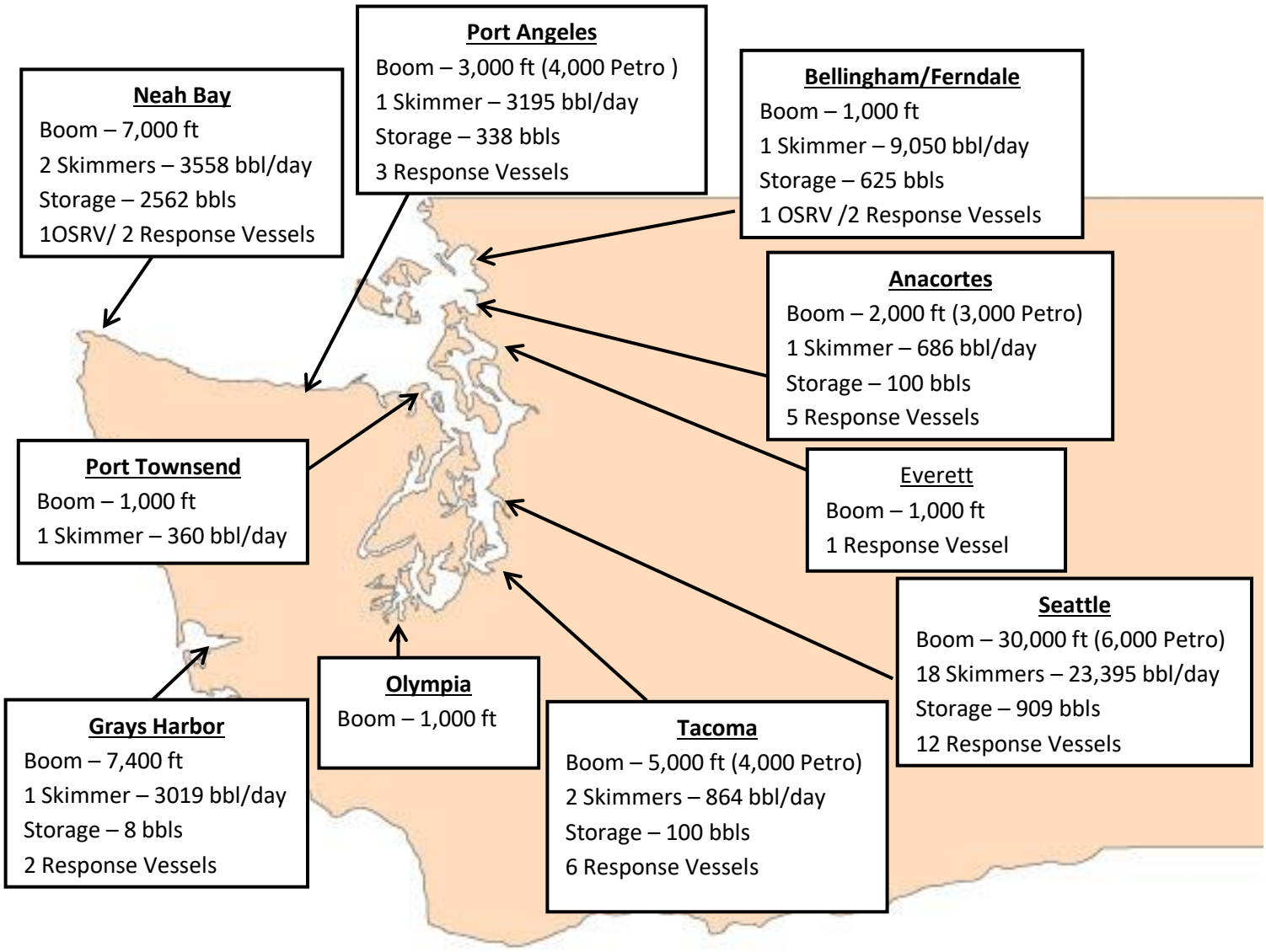
Ryan McCoy
Regulatory Specialist
National Response Corporation
3500 Sunrise Highway
Great River, NY 11739

In order to meet the 4-hour planning standards for Neah Bay (WAC 173-182-395), San Juan County (WAC 173-182-370), Grays Harbor (WAC 173-182-405) and Commencement Bay Quartermaster Harbor WAC 173-182-380 NRC has staged DESMI Speed Sweeps in Neah Bay

on the NRC Cape Flattery, in Anacortes on a trailer and at NRC Seattle on a trailer which is dedicated to the NRC WA Plan.

Through this prepositioned response equipment and ready response personnel, the recovery and storage planning standard requirements are met for the WCD amounts in the planning standard areas covered by the NRC Plan as described in Section 1.4, with the exception of the recovery and storage requirements in the Neah Bay Staging Area at hour 6. An alternative planning standard is used for the coverage of the Neah Bay Staging Area recovery and storage 6 hour requirements. This alternative planning standard is described in the next section.

Figure 5-4 Overview of NRC Spill Response Resources



5.4.2 Neah Bay Staging Area – Alternative Planning Standard

Due to infrastructure limitations in Neah Bay, NRC complies with the following alternative planning standard. This alternative planning standard applies to the 6 hour storage requirements for the Neah Bay Staging Area (WAC 173-182-395).

Recovery has been increased through the deployment of a Neah Bay On-Water Recovery Task force, utilizing three skimming systems. These skimmers will be the Aquaguard RBS-40, the Aquaguard RBS-10 and a new state-of-the-art Elastec X-150 skimmer. A task force diagram depicting the deployment of these skimming systems is enclosed in Appendix A. These skimmers are staged in Neah Bay, stored aboard the OSRV Cape Flattery, and ready for rapid deployment.

An Elastec X-150 skimmer uses grooved disc technology to achieve high efficiency recovery. The Elastec X-150 is the production version of the skimmer that won the X-Prize competition in 2011 for the most efficient skimmer with a documented recovery efficiency of over 90.1% in waves. This competition was held under rigorous standards, under a variety of induced conditions at the OHMSETT test facility.

Information on this skimmer and the efficiency results from the X-Prize testing are contained in Appendix A. The Elastec X-150 skimmer has a nameplate pumping capacity of 660 gpm or 22,629 bbl/day. Ecology has granted an alternative EDRC for this skimmer of 9,428 bbl/day.

Having the Elastic X-150 skimmer staged in Neah Bay provides the capability to quickly mobilize this skimmer, recovering oil with high efficiency early on in the response since this will be one of the first skimmers to respond to an incident in the vicinity of this staging area. The X-150 will be deployed as an advancing skimming system from a Shallow Water Barge (described below), tended by the FRV 7. The NRC workboat Red Rocket will tend boom to increase the sweep width of this skimming system. The X-150 skimmer will be rigged directly into the boom at the collection point and recover oil as the vessel moves forward. The deployment and operation of this skimming system will utilize 4 response personnel. Additionally, enhanced skimming will be implemented to increase effective sweep width through use of the NRC Robalo and a Makah vessel of opportunity (VOO), deploying 1,000 ft of boom to collect and concentrate oil for recovery by the X-150 skimmer. The Shallow Water Barge will provide the storage for this skimming system.

The Aquaguard RBS 40 drum skimmer (EDRC 2,427 bbl/day) will be deployed from the OSRV Cape Flattery. The deployment of this skimmer will be over the side of the vessel utilizing boom in a V-sweep configuration to collect and concentrate the oil. The deployment and operation of this skimming system will utilize 4 response personnel. Oil collected by this system will be stored in the vessel's 320 bbl capacity onboard storage tanks.

The third skimmer, the Aquaguard RBS 10 (EDRC 862 bbl/day) will be deployed from the FRV4 with boom in a J-configuration to increase effective sweep width and to collect and concentrate the oil. The deployment and operation of this skimming system will utilize 4 response personnel. Oil collected by this system will be stored in the 100 barrel dracone, also staged in Neah Bay.

Under measures for this Alternative Planning standard, resident skimming EDRC capability at Neah Bay was increased from 2,427 bbl/day to 12,517 bbl/day, a 416%increase.

On water storage capability has been enhanced with the staging of a Shallow Water Barge (SWB) in Neah Bay. After a thorough examination of options to place a barge in Neah Bay, a SWB (38.5 ft long x 16 ft wide, 249 bbl capacity) was determined to be the practical option to increase resident storage, given the current infrastructure in Neah Bay. This SWB is staged in the water for rapid deployment, moored alongside the OSRV Cape Flattery or in a slip at the Neah Bay marina. The SWB adds 249 bbls of resident in-water storage to Neah Bay. Other resident storage in Neah Bay includes 320 bbls of onboard storage on the OSRV Cape Flattery, the 100 bbl CanFlex dracone staged on the OSRV Cape Flattery and the nine 238 barrel fabric storage tanks staged at Neah Bay on a trailer. This totals 2,811 bbls of storage resident in Neah Bay. In addition to this resident storage in Neah Bay, within Hour 6 an additional 576 bbls of storage could be provided by the CanFlex tanks in Port Angeles and the SWB sets staged in Seattle. This is a total of 3,387 bbls of storage that could have arrived by Hour 6. Based on skimmer EDRC, this is more than enough storage to accommodate the oil recovered at Hour 6 by the 3 skimmers resident in Neah Bay.

Beyond Hour 6 and before the next planning standard increment (12 hours), 2,400 bbls of LOI storage from vacuum trucks and shoreside tanks could have arrived. Before Hour 10, an LOI tug and barge from Port Angeles could provide an additional 21,000. For planning purposes by Hour 12 an additional 625 bbls of storage from the OSRV Columbia and 30,000 bbls from an LOI barge could be provided.

In addition to the new the response measures described above, the OSRV Ironwood, another large open water capable vessel, staged in Astoria, OR, will also be made available as a response resource for the Neah Bay Staging Area. This vessel's capability would include 100 feet of ocean boom and a Crucial Disc skimmer with 1,440 bbl/day EDRC. Using a 1-hour mobilization time with a travel distance of 167 NM from Astoria, OR to the Neah Bay Staging Area and a transit speed of 10 kts, the vessel would plan to be on-scene in 17.7 hours of initiating mobilization. This resource would be in addition to NRC resources already in place planned to meet the 12, 24 and 48-hour requirements.

Credit for prevention measures: The Neah Bay Emergency Response Towing Vessel, described in Section 5.3.10 and Appendix E, funded in part by NRC Covered Vessels, is staged in this area and provides an opportunity for early intervention in incidents that pose a threat of a spill. This affords increased environmental protection though prevention.

Taken in total and in light of current infrastructure limitations in Neah Bay, the increases in resident skimming capacity and storage capacity, the addition of Shallow Water Barge sets in Seattle (1), Portland (2) and Grays Harbor (1), plus the presence of the ERTV in Neah Bay, constitutes an alternative planning standard for the 6 hour storage requirement that provides an equivalent or higher level of protection in terms of spill preparedness and response compared with the minimum requirements of WAC 173-182-395.

5.4.3 Grays Harbor Area – Alternative Planning Standard

The NRC Plan Grays Harbor Alternative applies to tank vessels transiting through Grays Harbor (WAC 173-182-405) to and while berthed and conducting transfer operations at Renewables Energy Group (REG) (WAC 173-182-355).

The Alternative is a combination of oil spill prevention and preparedness measures provided by NRC and REG that provide a higher level of protection than the requirements of these regulations. The Alternative meets the requirements cited in WAC 173-182-620, Alternative

method of Evaluating Planning Standards. The following measures together constitute the Alternative and are implemented each time a tank ship transits through Grays Harbor to and while berthed and conducting transfer operations at REG. These resources are also utilized as applicable to meet response requirements of Covered Vessels transiting Grays Harbor to non-REG destinations:

- Advanced notice of vessel arrivals and cargo volumes on board vessels are provided to REG, REG's contractors and the Department of Ecology in order to organize the prevention and preparedness measures prior to vessel arrival and transfer operations begin.
- Tug escorts are provided for all tank vessels entering Grays Harbor and calling at REG: At least one escort tug will meet an arriving tank vessel at the Grays Harbor entrance and escort it to the Hoquiam River where two tugs (escort and assist) assist the vessel during mooring procedures. This is above and beyond any regulatory requirements and a prevention measure that ensures assist tugs are in place as the vessels transit through the harbor.
- REG maintains contracts with both NRC and Cowlitz Clean Sweep (CCS). Each of these contractors has their equipment listed on the Western Response Resource List (WRRL). All WRRL equipment listed by these contractors is available for call out if a spill occurs at REG.
- Pre-booming of oil transfers will occur when it is safe and effective to do so.
- During transfers, REG will move the following personnel and equipment in place for rapid and aggressive response should a spill occur. An NRC skimmer vessel and a CCS boom vessel are re-positioned to temporary moorage at REG facility during transfers.
- REG provides storage for NRC spill response operations in Grays Harbor through a Letter of Intent providing NRC access to 48,000 barrels of their facility shoreside storage tanks (see Appendix B). Shoreside storage is also available as portable tanks accessed under the letter of intent between NRC and Baker Tanks Continental, Inc. Under this agreement, over 8,000 barrels of storage could be provided within 12 hours and 18,000 barrels within 24 hours.
- NRC Shallow Water Barge sets with capacity of 480 barrels are on standby in Grays Harbor during transfers providing immediate access to on-water storage. NRC maintains a letter of intent with Brusco Tug and Barge. The barge sets will be mobilized to support skimming operations using the Brusco tugs available under this agreement. The barges can also be used to cascade storage resources, transfer recovered waste to shore and avoid delays in recovery.
- NRC has also added four (4) Shallow Water Barge sets Harbor – two (2) in Portland, one (1) in Seattle and one (1) in Grays Harbor – which provide a total of 952 barrels additional on-water storage capabilities in advance of the 6 hours response requirement.
- The tank barge Kenny is capable of reaching the Grays Harbor Planning within 30 hours and arriving at the REG transfer site within 34 hours. This dedicated resource will provide over 30,000 barrels of additional on-water storage – more than double the 24-hour dedicated transfer requirement.
- All tank vessels are encouraged to utilize all information and follow all Standards of Care in the Grays Harbor Safety Plan. The plan can be located at: http://www.portofgraysharbor.com/harbor-safety/links.php

- The checklist below will be used to document compliance with the measures. Ecology inspectors may be present during transfers and unannounced drills may be used to verify compliance as well.

The above prevention and preparedness measures provide a higher level of protection than required in WAC 173-182-405 and WAC 173-182-355, are beyond regulatory minimum requirements and present a plan for a rapid, aggressive response should spills from tank vessels occur while in the Grays Harbor Area.

CHECKLIST FOR STANDARD OPERATIONS PRE-ARRIVAL/DEPARTURE OF VESSELS OPERATING AT IGH TERMINAL

The Washington State Department of Ecology requires the following precautionary measures. These special conditions are adopted, in part, to address a shortfall of on-water storage response capabilities for a worst-case discharge planning volume from on-land storage tanks.

First, all tank vessels that call on the REG Marine Terminal must be contracted with NRC. If a spill originates from the vessel then the NRC Plan will be activated. If the spill occurs during transfers or originates from the REG facility, this REG ICP will be activated. If the source of the spill is unknown both parties must work together to respond. Additionally, prior to the arrival or departure of tank vessels that call at the REG Marine Terminal, either to load or discharge oil cargo, REG must complete the following actions:

- ☐ Notify NRC and Ecology of a vessel in route to REG for a transfer. Include arrival time and transfer information.
- ☐ Confirm the vessel is a NRC Plan covered vessel
- ☐ Ensure that the worst-case discharge volume of the vessel is identified (fuel and cargo) and communicated to NRC, REG and Ecology.
- ☐ Ensure the vessel QI is in contact with REG.
- ☐ Ensure that REG and receives the Advance Notification of Arrival from Agent.
- ☐ Arrange for an escort tug to meet the vessel at the Westport entrance and escort it to the Hoquiam River.
- ☐ Arrange for two tugs (escort and assist) to be assigned to work with the vessel during mooring procedures
- ☐ Ensure that prior to the transfer the standard procedure per the Facility's Transfer Operations Manual is followed; PLUS:
- ☐ Provide notice of transfer plans to Cowlitz and NRC for personnel standby, to include product(s) and volume(s) to be transferred and transfer direction (vessel loading or unloading)
- ☐ Arrange for an NRC skimmer vessel (OSRV) to be re-positioned to temporary moorage at REG Terminal during transfers
- ☐ Ensure workboats and personnel to cascade the two mini-barges with a total of 480 bbl capacity are available for response during transfers.
- ☐ Arrange for the Cowlitz boom boat to be deployed at the REG Terminal during transfers
- ☐ Arrange for the transfer area to be pre-boomed by the Cowlitz boom boat (if within safe and effective operating limitations)

5.5 EQUIPMENT MAINTENANCE

WAC 173-182-270 Maintenance records for response equipment.

The spill response equipment maintained by NRC is inspected in a systematic approach:

- Verifying that the equipment is where it is supposed to be and maintenance is documented and up to date.
- Demonstrating that the equipment turns on and all of the other components/pieces needed to make it work are also there.
- Deploying the equipment in the appropriate operating environment.

NRC ensures that each piece of equipment and/or system goes through each of the above levels of inspection over time (6 years) in a systematic approach. At a minimum, half of the equipment/systems are inspected within the first triennial drill cycle (3 years) and the remaining half will be inspected in the following triennial drill cycle. NRC will ensure that documentation of equipment maintenance and inspections are kept on file for at least 5 years and made available to Ecology upon request.

See the NRC PRC Application for additional information on equipment maintenance procedures.

6. RESPONSE AND PROTECTION STRATEGIES

Contents

6.1 INTRODUCTION

GRPs are an annex to the NWACP and a key element of both facility and vessel contingency plans. The GRPs provide a description of sensitive biological, cultural, and economic resources that must be addressed in the event of a spill. Any spill response activities must be consistent with the applicable GRP, unless otherwise directed by the Environmental Unit.

GRPs contain detailed information useful for guiding the first 12 to 24 hours of an oil spill response. GRPs are designed to eliminate the confusion surrounding initial response, and to identify and prioritize sensitive resource areas requiring protection.

6.2 STRATEGY

Since all areas within the state are considered environmentally sensitive, the following environmental protection priorities apply:

1. The first priority will be, of course, to prevent any spills from occurring.

2. If a spill does occur, the next priority will be to contain and conduct on-water recovery of the spilled product before it reaches, or spreads, to any beach or shoreline area, particularly those with the greatest sensitivities as determined by the applicable GRPs.

3. If this fails, it will be the responsibility of the spiller to restore, as much as feasible, all oiled areas to their original or natural state. The guidelines for determining "How Clean is Clean" are included at the end of this chapter (Table 6-1). These guidelines have been used in previous oil

spills on the West Coast of the United States. They were drafted by the NOAA Scientific Support Coordinator (SSC) as part of the Regional IX Response Team (RRT).

4. In general, shoreline cleanup will be conducted pursuant to strategies described in the Shoreline Countermeasures Manual and Matrices in Section 9420 of the NWACP. Clean up actions will be approved by the ICS / Unified Command.

6.3 LOCAL AREA KNOWLEDGE

Local area knowledge can be an invaluable tool in the decision making process, and must be considered with other available resources. In addition to local residents and employees, many representatives on the RRT have extensive local area knowledge. Local boat operators, fisherman, and tribal or coastal resource managers may be consulted for specific area sensitivities and priorities at the time of a response.

6.4 PUBLICATIONS, CHARTS AND MAPS

A wide variety of published information is available regarding environmentally vulnerable or sensitive areas in the states of Washington. Because of the complexity and number of publications, charts and maps, they are hereby incorporated into this plan by reference only. The most significant publications, charts and maps include, but are not limited to:

Geographic Response Plans (GRPs)
GRPs clearly identify response strategies needed to protect sensitive public resources in an area, and present unified priorities for strategy implementation. GRPs also describe the natural and other public resources found in a region, as well as logistical information such as spill reporting contacts and equipment lists.

GRPs fulfill a number of the ACP content requirements under the Oil Pollution Act of 1990, and are considered annexes to the NWACP. GRPs for the State of Washington are incorporated into the NRC Contingency Plan by reference.

NRC will make practical and effective use of Geographic Response Plans (GRPs) for finding information about resources at risk, including benthic and water column resources (WAC 173-182-510), that may be threatened during a spill event. The Environmental Unit will evaluate all resources at risk throughout the various stages of a response to help mitigate environmental impacts. Relevant GRPs in the NRC WA Plan operating area include:

- Admiralty Inlet GRP
- Hood Canal
- Central Puget Sound
- Grays Harbor
- North Central Puget Sound
- North Puget Sound
- Outer Coast
- San Juan Islands
- South Puget Sound
- Strait of Juan de Fuca
- Willapa Bay

All of Washington's Geographic Response Plans are kept at:

https://www.oilspills101.wa.gov/northwest-area-contingency-plan/geographic-response-plans-grps/list-of-geographic-response-plans/

Washington State Coastal Atlas
https://fortress.wa.gov/ecy/coastalatlas/ "The purpose of the Washington Coastal Atlas is to make relevant information easily available for use in coastal and shoreline resource planning and management. Since inception in 1995, what is now known as the Washington Coastal Atlas has undergone many changes and upgrades to become what it is today. The Atlas is now used by many people and organizations including: local, state, and Tribal government agencies; private contractors; advocacy groups; educators; outdoor recreationalists; and interested citizens. The Washington Coastal Atlas is managed and maintained by the Washington Department of Ecology with funding from the National Oceanic and Atmospheric Administration (NOAA) Office of Ocean and Coastal and Resource Management (OCRM)."

Prepared by the Department of Landscape Architecture, University of Washington, for the Washington State Department of Ecology (March 9, 1992), this set of seven booklets covers:

- Coastal Bay
- San Juan Islands
- Outer Coast
- Upper Puget Sound
- Cape Flattery
- Lower Puget Sound
- Strait of Juan de Fuca

While the booklets provide information critical to protecting environmental resources, they were not designed to be comprehensive. Ecology's Oil Spill Compensation Schedule adds a more detailed level of information, such as the significance and abundance of particular species, seasonal variations, and migratory patterns. Used in conjunction, the two sources can serve as a reliable resource for spill contingency planning.

Northwest Area Contingency Plan (Sector Puget Sound and Sector Columbia River)
USGS District 13
15 Second Ave
Seattle, WA 98174
Telephone: (206) 220-7090

USEPA Region 10
1200 6th Ave
Seattle, WA 98101
Telephone: (206) 553-1200

Copies of the NWACP are widely distributed, and are readily available to all interested parties at: http://www.rrt10nwac.com/NWACP/Default.aspx

NOAA Environmental Sensitivity Index (ESI) Maps
Prepared for NOAA's Office and Response and Restoration by Research Planning, Inc,

Columbia, SC. If needed for an oil spill response, these detailed ESI maps will be utilized and interpreted by the NOAA Scientific Support Coordinator (SSC), as part of the RRT.

- Outer Coast of Oregon & Washington
- Puget Sound and Straits of Juan de Fuca

The ESI maps are available electronically in pdf format and may be obtained from NOAA on CD or by downloading. Information about how to obtain electronic ESI maps is available at http://response.restoration.noaa.gov/esi.

Salmon, Marine Fish and Shellfish Resources
Salmon, Marine Fish and Shellfish Resources and Associated Fisheries in Washington's Coastal and Inland Marine Waters. Technical Report No. 79 (April 1992, revised), published by the Washington State Department of Fisheries. This report contains extensive information that has been compiled for fisheries.

Tide Tables
Tide Tables (*available annually)*, West Coast of North and South America
U.S. Department of Commerce, NOAA, Washington, DC

Tidal Current Tables
Tidal Current Tables (*available annually)*, Pacific Coast of North America & Asia North
U.S. Department of Commerce, NOAA, Washington, DC

6.5 OTHER INFORMATIONAL RESOURCES

For other informational resources and services, see Appendix D and refer to the NWACP.

6.6 WILDLIFE RESPONSE PLAN

6.6.1 Wildlife Response Purpose and Organization

Introduction
The primary goals of the Wildlife Response Plan are to ensure that oiled wildlife response:

- Is conducted in a safe and effective manner for responders, animals, and the public.
- Is fully integrated into the overall spill response and ICS structure.
- Provides resources in a timely manner to minimize the impacts of an oil spill to wildlife.
- Provides best achievable capture and care for spill impacted wildlife based on the specific objectives of the Unified Command for the incident.
- Additionally, the plan is designed to:
- Meet all requirements of WAC 173-82-540 and WAC 220-450-100 Planning standards for wildlife response and WDFW rehabilitation requirements.
- Provide clear details on the Primary Response Contractor (PRC) and Wildlife Response Service Provider (WRSP) resources required - including personnel, equipment and facilities - that will be available to carry out the incident specific plan that is developed by the Wildlife Branch and approved by the Unified Command.
- Outline tactical options that the plan holder’s WRSP contractors are skilled in executing and that can be used in developing the incident specific plan.

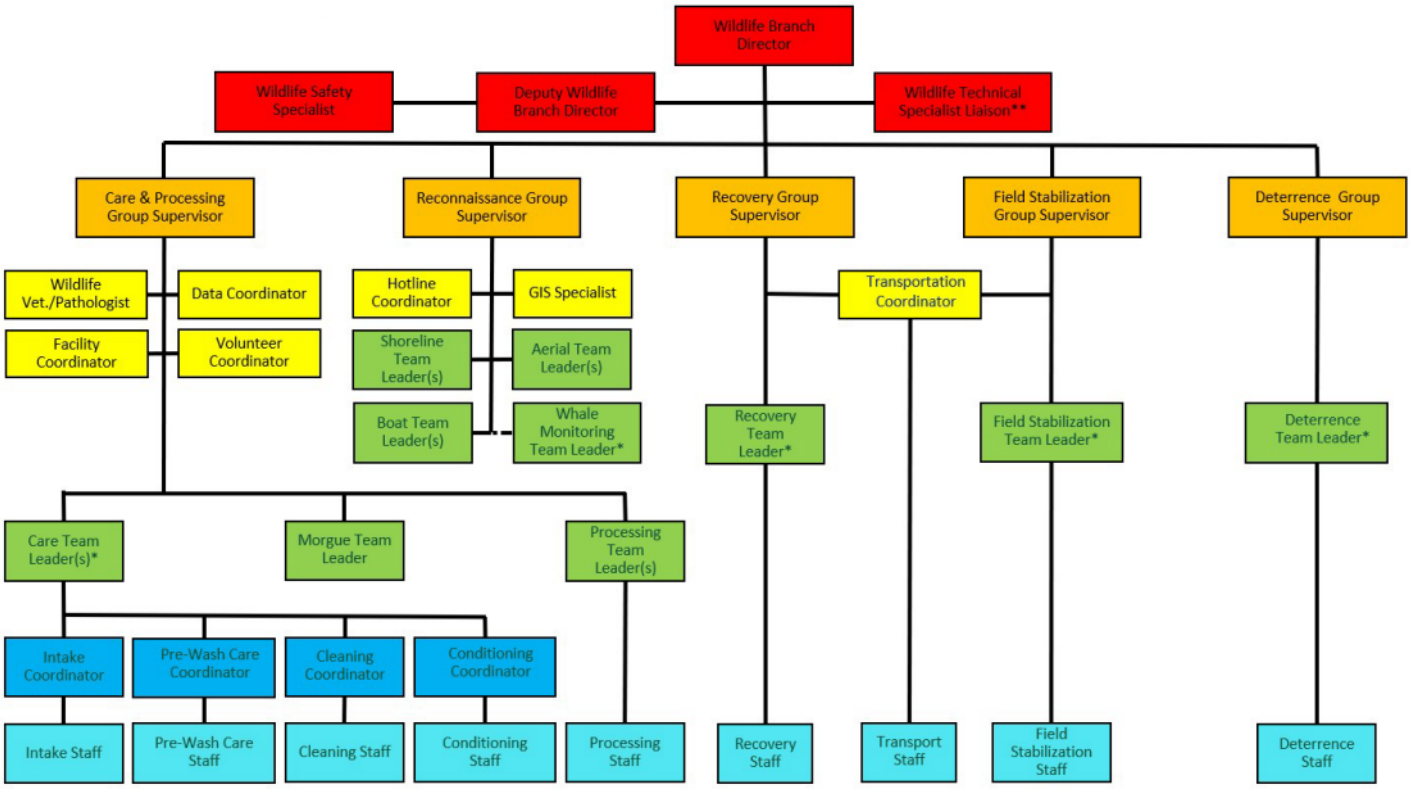
Plan Organization

The Plan is organized to be consistent with both the NRC Covered Vessels Washington State Contingency Plan and the Northwest Area Contingency Plan (NWACP) in general, and the sections applying to wildlife specifically. These include Sections 9310 - Northwest Wildlife Response Plan, 9311 NW Area Wildlife Deterrence Resources, 9312 Oil Spill Marine Mammal Resources, 9313 Wildlife Branch Position Descriptions, and 9314 Potential Mobile Bird Rehabilitation Unit Deployment Locations in Coastal Counties.

6.6.2 Wildlife Response Organization

This plan is designed to be easily integrated into and consistent with the NWACP and utilizes the same organizational structure for Wildlife Response as laid out in Section 9310 v.22. It is not meant to duplicate or provide detailed information on all aspects of oiled wildlife response in an i ncident. It is intended to provide a high-level overview and refer to existing documents recognized and utilized by NW Area Committee and response community for more detailed information. The Wildlife Branch operates within the Operations Section with close cooperation and communication with the Environmental Unit within the Planning Section. Wildlife Response is divided into three groups under the direction of, and reporting to, the Wildlife Branch Director. As shown in the Wildlife Branch Organizational Chart below (following the NW Wildlife Response Plan) the groups are: Wildlife Reconnaissance, Deterrence, Recovery, Field Stabilization, and Care and Processing. Each of these groups have a number of responsibilities and may be broken into a number of units to address the unique needs of each response.

Figure 6-1 – Wildlife Branch



* Portions of this structure may be duplicated to support the response needs associated with different species groups (otters, seals, whales, etc.) as need, while maintaining centralized response operations.

** Wildlife Technical Specialist/Liaison(s) coordinate with other ICS sections including Environmental Unit, Finance, Logistics, Situation, and others.

The Wildlife Branch will use oiled wildlife response protocols that are recognized as best practice and have been utilized and improved upon in hundreds of responses throughout the world over the last 30 years. These protocols are consistent with the NWACP and are repeatedly referenced within it. They are also consistent with the National Wildlife Rehabilitators Association and International Wildlife Rehabilitation Council's Minimum Standards for Wildlife Rehabilitation (4th edition 2012). They include NOAA's Pinniped and Cetacean Oil Spill Response Guidelines (2015), Oil Spill Emergency Response Killer Whale – Hazing Implementation Plan (2014) and Supporting Information for the Killer Whale Section of the Northwest Wildlife, and Focus Wildlife's Protocols for the Care of Oil Impacted Wildlife.

6.6.3 Initial Response Actions

Activation of the Wildlife Branch

Under the NWACP, the Wildlife Branch is activated when an oil spill is in the vicinity of wildlife resources or has a trajectory that puts them at risk. Initial activation may be only a Wildlife Branch Director if the risk is thought to be low at the outset. The policy of the NW Area Committee is that USFWS will fill the role of Director and Deputy Director of the Wildlife Branch unless they delegate those roles to other parties. As stated in the NW Area Wildlife Plan, "unless otherwise indicated by USFWS, the Wildlife Branch Director position will be delegated to the WDFW for spills that occur within the legal boundaries of Washington State. Focus Wildlife, an authorized WRSP recognized by Washington Department of Ecology can provide staff experienced as Director and Deputy Director of the Wildlife Branch. Based on the staffing policy of the NWACP, WRSP personnel could take the role of Deputy Wildlife Branch Director working alongside a Wildlife Branch Director from WDFW. Once a Wildlife Branch Director is in place, they will determine the specific immediate priorities. The following actions are typical initial priorities in oiled wildlife response.

Assessment of Potential Impacts and Initial Mitigation Strategies

Reporting Impacted Wildlife

Initial efforts will include evaluating any current reports of oiled wildlife. In some incidents the initial responders, members of the public, or local agencies may see or even collect potentially impacted wildlife before the Wildlife Branch is activated. If this occurs, these parties may notify the Washington Emergency Management Division prior to an ICP being established at 800 258-5990 for generic reporting of oiled wildlife. The Washington Department of Fish and Wildlife (WDFW) has an oiled wildlife hotline 800-22-BIRDS tied to a voice mail system that will be activated by WDFW if warranted. Other reporting protocols may be implemented during a response. NRC will activate mobilization of Focus Wildlife resource by calling 1-800-578-3048. Once activated, reporting systems should be quickly supported by live personnel to provide near real time reports of oiled animals to wildlife field personnel.

Development of Initial Wildlife Reconnaissance and Monitoring Plan

An early priority will be acquiring real time information on species and number of animals in the response area. The highest priority will be to quickly gain a broad overview to help in the planning and prioritization of initial deterrence and recovery efforts and should include species behavior such as feeding, breeding, nesting and daily movements throughout the area if possible. Aerial surveys may provide a good general picture - especially if the observer is experienced in identifying wildlife from the air - although ground/vessel based teams will likely be required for more specific information. If dedicated aerial wildlife resources are not available, a seat on an overflight conducting spill trajectory observations may be useful for wildlife

observations in the immediate spill area. Aerial surveillance services are described in Attachment F-12 of NRC's PRC Application.

Evaluations of Wildlife Deterrence Options

Keeping animals away from oil is always a better alternative than recovery and rehabilitation and, in some responses, there may be opportunities to keep wildlife from becoming oiled. One means of doing so is to conduct deterrence (aka "hazing") activities that encourage wildlife to move away from an area in which they may become oiled. Several factors will determine the likely success of deterrence including species, species' activities, topography, places of refuge, and availability of equipment and personnel. While the Wildlife Deterrence Units as defined in the NW Wildlife Response Plan will probably not be organized immediately, much of this information can be gathered and prioritized during initial assessment/reconnaissance and can be evaluated quickly by the Wildlife Branch Director. Even if it is determined that there are no viable deterrence strategies initially available, there should be continuous evaluation throughout the response to determine whether opportunities for these activities exist. Details on bird deterrence techniques can be found in Bird Hazing Manual: Techniques and Strategies for Dispersing Birds from Spill Sites, Gorenzel and Salmon, University of California Agriculture and Natural Resources Publication 21638. A link to the downloadable pdf can be found at https://anrcatalog.ucanr.edu/pdf/21638.pdf. Wildlife deterrence resources such as flags, effigies, and canons are maintained by Focus Wildlife and NRC. Staging locations and equipment details can be found on the WRRL and in the state approved applications.

Evaluation of the Use of Preemptive Capture Options

Preemptive capture is another method for keeping animals from becoming oiled. It involves capture and either holding animals in captivity or relocating them outside of the projected response area. As described in the NW Wildlife Response Plan, preemptive capture may be considered in cases where there are very high priority species that can be safely captured and maintained in captivity or, if relocated, will not immediately return to the site of the response

Evaluate Potential for Impacts Across State Borders

If there is a possibility of impacts to wildlife across state borders (including wildlife oiled on one side that then travels to the other side) contact should be initiated with the Liaison Officer and relevant trustees to determine how best to ensure an effective response while meeting the needs of the trustee agencies of each state. Selected contacts for the Oregon Department of Wildlife are available in the Wildlife Contact List in the NWACP ICS Tool Kit on https://www.OilSpills101.wa.gov. If there is a recognized threat, there may already be representatives present in the Environmental Unit.

In the case of the potential for impacts occurring across the US/Canadian border, more formalized discussions will be required to evaluate the potential for the movement of wildlife, personnel, and equipment across the international border.

Wildlife Response Plan for Submission to Planning Section

Wildlife response plans will be drafted within the Wildlife Branch based on information collected from the initial notification, overflight observations, and any wildlife assessment conducted by the WRSP. Section 9310 of the NWACP contains a significant amount of information that can assist in development of the initial plan.

Wildlife plans should include tasks associated with the reconnaissance, deterrence, recovery, transport, field stabilization and primary care activities associated with oiled wildlife response based on the needs of the current and following operational period. Activities should

accommodate any species groups likely to be impacted and the plan should address any species-specific activities that may be required. Specifically, the plan should:

- Identify site(s) for Wildlife Rehabilitation Facilities.
- Identify site(s) for staging of deterrence, recovery, transport and if appropriate field stabilization.
- Provide for activation of initial personnel and equipment resources.
- Reference the most current resources at risk information available from the Environmental Unit (ICS form 232) or from Chapter 6 of the appropriate Geographic Response Plan (GRP) where the incident has occurred. Links to specific Washington Department of Ecology GRPs can be found at https://www.oilspills101.wa.gov.
- List initial prioritized tasks expected to be carried out in the operating period.
- Provide a Wildlife Branch Organization Chart (ICS 203).

The Wildlife Response Plan must be evaluated and updated throughout the response to reflect the changing information, circumstances and priorities as the response evolves.

Whale Reconnaissance, Monitoring, and Deterrence

Southern Resident killer whales are listed as endangered both by the state and the federal government. Minimizing any impacts from an oil spill is an extremely high priority. The WAC 173-182-540 (2) b-d regulations list specific requirements for a plan covering area of potential impacts of whales which may include Southern Resident killer whales. It requires the ability to provide reconnaissance and monitoring of whales outside of the immediate spill area, which has been defined by NOAA as within 30 miles relative to the spill or spill trajectory. Identification of whales to the level needed to effectively respond requires specialized personnel and the proper equipment. Both boat and air surveys should be anticipated. Section 9310.10.2.4 of the NW Wildlife Plan provides guidance on killer whale response and links to further guidance documents provided by NOAA to the NW Area Committee that detail appropriate personnel and methods. These include Supporting Information for the Killer Whale section of the Northwest Wildlife Response Plan, which provides:

- Contact details for organizations able to identify killer whales to ecotype, pod and individual,
- Contact details for deterrence equipment
- Oil Spill Emergency Killer Whale Hazing Implementation Plan, which provides guidance on methods for deterrence including pre-approved methods in situations where immediate action is necessary.
- Pre-approved methods include helicopters, Oikomi pipes and underwater firecrackers (seal bombs).

Vessels and Personnel for Monitoring and Deterrence

Whales can be found in all marine areas of Washington State's Puget Sound, Strait of Juan de Fuca, and Outer Coast. During an oil spill in or near these waters, it is crucial to monitor for whales in and beyond the immediate spill area, and to be prepared to deter them away from the oil if necessary. The NRC Covered Vessels Contingency Plan is committed to supporting whale monitoring and deterrence during an oil spill. This includes the rapid procurement of personnel and aircraft capable of supporting aerial reconnaissance and deterrence, and prompt coordination with the individuals and organizations with authority and resources capable of conducting this work. Aircraft are available through NRC. A list of individuals and organizations

capable of conducting whale reconnaissance and deterrence is available in the Wildlife Contact List in the NWACP ICS Tool Kit at https://www.OilSpills101.wa.gov and NWACP Section 9312. Deterrence of SRKWs can impact their health, and deterrence activities must be done in accordance with federal laws that protect whales. The Marine Mammal Protection Act (MMPA) prohibits harassing, harming, or killing marine mammals, but has an exemption for federal or state employees if the harassment to marine mammals is necessary for the health and safety of the animals. The Endangered Species Act (ESA) has similar prohibitions, but does not have a specific exemption for federal and state employees.

The National Marine Fisheries Service has authorized SRKW deterrence activities to be conducted through a scientific research and enhancement permit held by NOAA's Marine Mammal Health and Stranding Response Program. The permit is consistent with protections of the MMPA and ESA, and covers oil spill-related actions in Puget Sound and the Salish Sea. Under oversight by Federal and State agencies and, in accordance with the permitting requirements, all marine mammal deterrence operations conducted within the Wildlife Branch will be led by NOAA or the USCG FOSC prior to NOAA becoming engaged.

The Northwest Area Contingency Plan (NWACP) Section 9310, *Northwest Wildlife Response Plan*, describes monitoring and deterrence for large whales including orca. NWACP Section 9311 describes deterrence resources in the Northwest region, including contact information for each equipment cache and information for ordering new equipment. The Worldwide Response Resource List (WRRL) lists contact information and characteristics on various types of oil spill response equipment, as well as pre-contracted and pre-trained Vessels of Opportunity (VOO) in the Pacific Northwest, that can be called out by NRC. In addition to the resources identified in the NWACP and WRRL, the Washington Department of Ecology enrolls VOO that may be available at the time of a spill to supplement monitoring and deterrence efforts. VOO are registered through the OilSpills101.wa.gov website and can be called-out during drills and spills if needed. The query of the database will be led by the Liaison section through Ecology's Jetty system upon request by the Unified Command or if the Wildlife Branch Director deems additional volunteer assets necessary.

Additional potential resources to considered when establishing a monitoring program for whales during an oil spill in Washington include: the Pacific Whale Watch Association, Orca Network, and OrcaSound. Pacific Whale Watch Association is a local community of whale watching vessels who may have VOO vessel resources or personnel with knowledge of recent whale locations and movement patterns. Orca Network is a citizen-science based program that tracks the locations of Washington's Orca whale sightings. OrcaSound is a network of underwater microphones (hydrophones) in the North Puget Sound and San Juan Islands capable of detecting Orca in the surrounding waters. Contact information for these organizations are available in the Wildlife Contact List in the NWACP ICS Tool Kit at https://www.OilSpills101.wa.gov.

6.6.4 Post Emergency Phase Response Actions

Much of an oiled wildlife response occurs in what can be considered the post-emergency phase once the initial plan has been approved, resources are in place, and the range of Wildlife Branch activities appropriate to the incident are taking place. These activities include:

Reconnaissance
Daily reconnaissance activities should be done to identify oiled and unoiled wildlife within the spill response area and surrounding areas. This is done to direct the activities of search and

collection teams, to identify opportunities for deterrence of unoiled wildlife and to document impacts of the oil spill and the response activities on animals in the region. In addition to normal reconnaissance activities, in some areas there will be the need for ongoing monitoring of whales, including Southern Resident killer whales well beyond the immediate operational area of the response. Whale deterrence beyond the area of normal operations may be required to reduce impacts to these animals.

Preventing Secondary Oiling Impacts

Preventing secondary oiling impacts should always be done where possible through deterrence and collection of oiled carcasses that may attract predators and/or scavengers. This should include consistent evaluation of opportunities to keep animals from becoming oiled and effectively execute incident specific appropriate techniques keeping unimpacted animals out of the impacted area.

Documenting Impacts

Wildlife impacts must be documented through reconnaissance and collection and processing of oiled carcasses and of live oiled animals. Wildlife recovery teams should be supervised and deployed in an effective and efficient manner utilizing all available information on wildlife movements and activities and matching that information with appropriate techniques, personnel, and equipment. Safety and effectiveness of alternative techniques should be continually evaluated, such as on water capture, night operations, and trapping.

Field Stabilization

Decisions on whether to institute stabilization care in the field followed by transport to designated rehabilitation facilities, or simply have recovery personnel transport animals directly to the rehabilitation facility, must be made and enacted. Field stabilization is the initial mitigation of oiling and is typically initiated when the transport time from the collection point to the rehabilitation center exceeds a few hours. Whenever transport is undertaken, appropriate vehicles to safely transport oiled wildlife to the primary care facility must be used (e.g., climate-controlled enclosed vehicles for oiled birds). NRC has a stabilization trailer to support this function. Trailer details and staging information can be found in the WRRL.

Rehabilitation Care

Details on species-specific rehabilitation techniques are documented in other protocols, but all must accomplish the following:

- Document oil impacts and evaluate physical condition for each individual animal.
- Provide stabilization care to ensure fitness for removing oil.
- Remove oil, all cleaning solution residue, and dry feathers or fur.
- Restore the condition of oiled animals to promote survival and normal behavior in the wild.
- Evaluate fitness for release, in consultation with trustee agencies determine site of release and place permanent marking on the animal as appropriate and permitted.
- Transport to release site and release.

Post-release Studies

In collaboration with trustee agencies, post release study opportunities and priorities, such as radio telemetry or color marking, should be discussed as early in the response as feasible. Even where active post-released studies are ruled out, permanent marking of released wildlife should be done following USFWS and NOAA guidelines, when feasible.

Demobilization

A plan for demobilization or downscaling of the Wildlife Branch should be developed midway through the response. Due to the nature of wildlife rehabilitation the activities of the Wildlife Branch are likely to last much longer than most other areas of the response. These activities will continue until all wildlife has been released from the rehabilitation facility or has been determined to be un-releasable and transferred to permanent care or euthanized. There should be regular evaluation to ensure that the Wildlife Branch is right sized to meet the current objectives of the Unified Command for the Wildlife Branch.

6.6.5 Wildlife Response Resources

Personnel Resources for Wildlife Response

NRC has a contract with Focus Wildlife (available for review by Ecology upon request) to provide staff positions within the Wildlife Branch within 12 to 24 hours. Details regarding personnel training, locations and response times are provided Focus Wildlife's WRSP application. Section 9312 of the NWACP - Marine Mammal Resources lists organizations and personnel that have significant experience and expertise in marine mammal capture, handling, deterrence, transport, and husbandry.

Specialized Personnel Resources for Killer Whale Reconnaissance, Monitoring, and Deterrence

Sections 9311 and 9312 of the Northwest Area Plan list several resources to provide marine mammal specialist personnel to be utilized in killer whale Reconnaissance, Monitoring and Deterrence under the direction of NOAA staff. Cascadia Research Collective located centrally in Olympia. Washington can be reached at 360-943-7325 and has extensive experience to provide capable personnel in this area.

Wildlife Equipment and Facilities Resources

While some of the equipment and facility resources needed in oiled wildlife response (such as boats and aircraft) are utilized in many areas of the response other resources (such as specifically outfitted trailers) are very specific to wildlife response. Contracts with PRCs provide access to a wide range of equipment and supplies including boats, aircraft, and personal protection equipment (PPE) that can be utilized for oiled wildlife response. NRC provides the NRC Covered Vessel Contingency Plan wildlife response equipment. These wildlife equipment stockpiles include specialized equipment for use in recovery and rehabilitation of oiled wildlife. While the equipment has been largely been developed to meet initial needs for birds it can be utilized for a variety of species. A detailed equipment list can be accessed via the Worldwide Response Resource List (WRRL) at www.wrrl.world.

Field Stabilization

Field Stabilization is generally the first step in reversing the effects of oiling and requires space and equipment to evaluate wildlife, provide first aid such as supplemental heat and fluids and hold them safely prior to transport to the wildlife rehabilitation facility.
The Focus Forest River Stabilization Trailer provides equipment and supplies for mobile field stabilization activities, including conducting the initial health assessment and treatment of impacted wildlife prior to transport to an oiled wildlife rehabilitation facility. The Trailer meets field stabilization asset requirements of providing an enclosed space of at least one hundred eighty square feet, lighted and heated, and is capable of arriving on-scene within twelve hours of spill notification. Further details are in the Focus PRC Application.

Mobile Rehabilitation Units (MRU)
NRC maintains a trailer-based Wildlife Mobile Response Unit Equipment (Wildlife MRU Equipment) capability designed to support wildlife rescue and rehabilitation activities related to oil spills. NRC is capable of deploying the Wildlife MRU Equipment to locations within Washington State within 24 hours of request. See NRC's PRC Application for more information.
5.2.3 Specialized Equipment for Killer Whale Reconnaissance, Monitoring, and Deterrence
NRC provides air support that could be used for Whale Monitoring and Deterrence. Note that aircraft and flight personnel must be suitable for extended offshore monitoring operations. Deterrence equipment - The three methods for killer whale deterrence that have been pre-approved by NOAA Fisheries in certain circumstances are herding/hazing by helicopter, Oikomi pipes, and underwater firecrackers. A set of Oikomi pipes owned by NOAA are stored at IOSA in Friday Harbor. IOSA can be contacted through 360-468-3441. WDFW has additional pipes stored in Olympia. NOAA has underwater firecrackers and other marine mammal deterrence equipment in Seattle and can be contacted through Lynne Barre at 206-718-3807.

6.7 SHORELINE ASSESSMENT

A Shoreline Assessment Program will be established in accordance with section 9421 of the Northwest Area Contingency Plan. This plan establishes a SCAT program including reconnaissance activities, cleanup recommendations, treatment endpoints, and the final sign off process. SCAT surveys will occur before shoreline cleanup operations begin.

Shoreline types that could be impacted by an oil spill
A good understanding of oil penetration and retention is essential for establishing shoreline response priorities. The degree to which oil will penetrate a shoreline depends primarily on the permeability of the sediment and the viscosity of the oil. Gravel beaches, for example, have high permeability and are easily penetrated by light to heavy weight oils. On the other hand, fine sandy beaches and mud flats are not easily penetrated by many oils. This is especially true if these beaches are wet before contact with oil.

Oil retention is governed by the rate at which environmental factors remove oil from a given shoreline. These factors include wave energy, natural erosion, tidal action, evaporation, and biodegradation. Areas that experience high wave energy or high natural erosion should be given a lower priority for response because these processes will eventually force the oil into the water column where it will undergo biodegradation. By comparison, oil retention will be high in calm shoreline areas that do not experience high wave energy. Therefore, these areas should receive higher priorities for protection and cleanup. The shoreline types that could be impacted by an oil spill from Covered Vessels include the following:

- ESI 1 – Exposed Rocky Cliff Face & Vertical Sea Walls or Piers
- ESI 2 – Exposed Wave-Cut Platforms
- ESI 3 – Fine to Medium Grained Sand Beaches and Unvegetated Steep River Banks
- ESI 4 – Coarse Grained Sand Beaches
- ESI 5 – Mixed Sand and Gravel Beaches
- ESI 6A – Gravel Beaches – Pebbles to Cobbles
- ESI 6B – Gravel Beaches – Cobbles to Boulders
- ESI 7 – Exposed Tidal Flats
- ESI 8A – Sheltered Vertical Rocky Shores & Solid, Vertical, Man-Made Structures
- ESI 8B – Sheltered Rubble Slope
- ESI 9A – Sheltered Tidal Flats of Sand and Mud
- ESI 9B – Sheltered Vegetated Low Bank

- ESI 10 – Salt & Fresh-Water Marshes (Herbaceous & Woody Vegetation)

In the event of an oil spill, Environmental Sensitivity (ESI) Maps will be used to determine the specific shoreline types at risk of being oiled. ESI maps are prepared by NOAA and can be found in various online mapping applications including NOAA's Environmental Response Management Application (ERMA) and at https://erma.noaa.gov/northwest.

Each shoreline type presents unique challenges and considerations when responding to oil on the shore. The NWACP section 9420 provides detailed descriptions, predicted oil impacts, and response considerations for each of the aforementioned shoreline types. This contingency plan is committed to using the information and tools in the NWACP, including 9420 Northwest Area Shoreline Countermeasures Manual and Matrices; 9421 Shoreline Cleanup and Assessment (SCAT) Response Tool; 9422 Shoreline Segmentation Guidance for Shoreline Cleanup and Assessment Techniques (SCAT).

Contracted Resources for Shoreline Cleanup
NRC meets all of the planning standards for shoreline cleanup (WAC 173-182-522) for the NRC Plan, including:

(a) access to one hundred trained shoreline clean-up workers;
(b) access to trained shoreline clean-up supervisors;
(c) access to adequate equipment for passive recovery for three miles of shoreline on three tide lines;
(d) access to a shoreline clean-up mobile storage cache that can support eighty to one hundred shoreline clean-up workers with personal protective equipment, hand tools, and other logistical support for three to five days.

The shoreline cleanup response trailers are detailed on the WRRL at www.wrrl.world. Details about staging of passive recovery equipment and logical resources for sourcing additional equipment are detailed in the PRC application. Information on the training program for shoreline cleanup supervisors and shoreline cleanup workers can be found in the PRC's application.

Shoreline Cleanup Data Management
A shoreline cleanup data management plan (including data collection, data communication, and data transmission) will be developed in accordance with the guidance in the NWACP section 9421. Depending on the scale of the response, data management may be handled by the SCAT Coordinator or a delegated Data Manager.

6.8 SHORELINE CLEANUP

An oil slick that is not contained will be carried by winds and currents into the open sea or onto a sensitive shoreline. Oil carried ashore should be removed quickly and thoroughly to minimize damage to property and sensitive ecosystems. However, this is a complex ecological, technological and political issue. No decision-making process shall be undertaken without first consulting with experts in the field. Typically SCAT leaders will identify priorities for cleanup operations and make recommendations for appropriate cleanup techniques. Shoreline cleanup operations should be defined on a segment-by-segment basis and must be reviewed and approved by Unified Command.

The extent and type of cleanup to be conducted on an oil shoreline will be determined on a case-by-case basis. The following factors will be considered in making decisions about whether to proceed with shoreline cleanup, and if so, to what extent.

1. Will cleanup activities do more damage to sensitive shorelines than leaving the oil to biodegrade naturally?
2. Some shoreline areas are not readily accessible to appropriate recovery equipment.
3. Before cleanup of any shoreline takes place, the company legal / claims coordinator must procure authorization from the appropriate land management agency, or private land owner. Certain land classifications such as national and state parks, tribal lands, game refuges, archaeological sites and private land may preclude cleanup operations, even when those activities are in the best interest of the particular shoreline.
4. Biological and physical characteristics of a contaminated shoreline need to be evaluated. Sheltered shorelines not exposed to wave / flushing action may likely be given the highest priority for protection and cleanup.

SCAT teams usually will recommend cleanup levels and end-points by shoreline types (Table 6-3). Following cleanup operations, SCAT teams will survey the segment and determine if agreed end-points have been met. If affirmative, operational cleanup on the segment is deemed complete. Otherwise, additional follow-up actions may be required as defined by the SCAT team(s) and approved by Unified Command. See NRC PRC Applications for further details on shoreline cleanup operations and tactics.

Table 6-1 Guidelines for Determining How Clean is Clean

GUIDELINES FOR DETERMINING HOW CLEAN IS CLEAN
The following guidelines will be used to determine when individual shoreline segments will be considered for sign-off. The cleanup criteria listed below are provided for general guidance. Exact clean up end points will be determined on a case by case basis. Once a segment has met the cleanup criteria, a team of three people will visit the site for inspection and potential sign-off. This Shoreline Cleanup Assessment Team will consist of one representative from the responsible party (spiller), the state, and the federal government. The three entities being represented should choose two people to be team members to allow for multiple teams and /or allow for flexibility in scheduling site visits. Team members should be designated in advance and every effort should be made to keep these representatives consistent throughout the sign-off procedure. All representatives must have the signature authority from their respective organization/agency in order to participate in this process. Clean up endpoints may take into consideration the following: 1. There may be no free oil remaining either on the water or in the sediment. 2. There may be no oiled debris remaining on the shore or trapped amongst the shoreline vegetation. 3. Only a dry oil stain may be left behind. No wet oil may be left on shoreline or shoreline vegetation. Wet oil may be removed from the shoreline and any impacted vegetation must be similarly removed. 4. Impacted marshes and mud flats may be considered clean when it is determined that mechanical and manual cleanup efforts have reached their maximum effectiveness. At that point the Unified Command may determine if further mitigation is necessary (e.g. vegetation cutting, bioremediation). 5. Trenches should be dug to ensure that there is no buried oil in the sediment. (If buried oil is discovered, then the responsible party should submit an action plan detailing the removal and /or remediation). When the responsible party believes a segment meets the cleanup endpoint criteria set for a particular spill, then a walk-through by the Shoreline Cleanup Assessment Team can be scheduled. The decision by the team that the segment is clean must be unanimous. Otherwise, the team will issue specific, additional cleanup recommendations for those areas that do not meet these criteria.

7. WASTE MANAGEMENT

Contents

7.1 INTRODUCTION

Spilled oil and oil contaminated debris recovered from water and/or shoreline cleanup operations must be properly handled and disposed of by the responsible party (spiller), or the agent or contractor acting on behalf of the responsible party. The NWACP is the guiding document for the information provided in this section of the NRC Plan. This chapter is intended to be consistent with the NWACP and is also provided to emphasize the importance of properly handling the waste streams generated during an oil spill cleanup from early on in the response.

Specific disposal methods will depend on the nature of the oil-contaminated material, prevailing weather conditions, location, and available disposal sites. If not handled correctly, disposal can pose temporary and long-term problems. A variety of disposal methods can be used on both small and large spills, including: oil / water separation and reclamation / recycling of the oil, incineration, landfilling, and natural biodegradation. For additional / detailed information about this subject, consult the NWACP.

7.2 SCOPE AND RESPONSIBILITY

This chapter applies to any oil spill cleanup operation conducted under the NRC Plan on behalf of a Covered Vessel and to the disposal of any oil or oily debris recovered during the cleanup operation. Furthermore, it is assumed that oily waste is the result of spilling a known type of oil, where the characteristics of the material are known and well documented.
Disposal records will be generated during the course of the response, and these will be provided to Ecology upon request.

7.3 LEGAL REQUIREMENTS

Under both federal and state law, the spiller is responsible for immediately collecting and recovering the maximum feasible amount of oil spilled, as well as for cleaning up the residue and restoring the environment to its original / pristine state. Under the provisions of RCW 70.105 (Hazardous Waste Management statute) and WAC 173-303 (Dangerous Waste Regulations) crude oils and fuel oils may be classified as extremely hazardous waste or dangerous waste upon spillage because of their carcinogenicity and flammability (benzene and low flash point). As these oils weather (volatilize), they lose those characteristics and may be downgraded to solid waste. To document the reclassification, the oily waste must be tested under the provisions of WAC 173-303. Oil recovered and recycled as fuel is not considered a waste and does not fall under the provisions of WAC 173-303.

7.4 POLICY

The policy of the NRC Plan for Covered Vessel cleanup operations will be to recycle and reuse recovered oil and to incinerate oily debris to the maximum extent feasible, thus reducing the amount of oily debris disposed of at a solid waste landfill. As generator of recovered oil and oily waste, the RP is ultimately responsible for designating the disposal method and providing a QI to authorize all disposal decisions.

7.5 DECONTAMINATION

Keeping the oil and oily debris limited to a controlled area, as well as minimizing the contact of uncontaminated personnel and equipment with already contaminated personnel and equipment, requires established procedures and discipline.

7.6 RECOVERED OIL - RECYCLING

Oil recovered from surface waters during skimming operations or otherwise shall be recycled and is not considered a "waste" under WAC 173-303. Recovered oil can be recycled at one of the oil recycling facilities listed in Table 7-1. Alternatively, oil recovered in the early stages of a major spill is generally all reclaimable at local refineries. Further, any recovered oil should be transported to said facilities, in sealed containers, using a registered handler. A bill of lading or manifest will record volume, material and disposition.

Table 7-1 Oil Recyclers - State of Washington

1. **PRS Group, Inc.** 3003 Taylor Way Tacoma, WA 98421 253-383-4175 Phone 206-255-7432 (24-Hour) http://www.prsplant.net
2. **Thermo Fluids** 1517 Pease Avenue Sumner, WA 98390 253-863-3310 Phone 800-350-7565 http://www.thermofluids.com
3. **Stericycle Environmental** 20245 77th Avenue Kent, WA 98032 509-547-8242 Phone 877-577-2669 (24-Hour) https://www.stericycleenvironmental.com
4. **Marine Vacuum Services (Mar-Vac)** 1516 South Graham Street Seattle, WA 98124 206-762-0240 Phone 800-540-7491 (24-Hour) http://www.marinevacuum.com

7.6.1 Initial Process

Both on-water and shoreside storage are needed for proper waste management. Initially, oil and oily water mixtures recovered from spills will be pumped into the recovery vessel's onboard storage, or an on-water storage device such as a barge or dracone. The oil and oily water mixture may then be transferred from the initial on-water storage to onshore storage devices such as waste oil barrels, tanks or bladders. This will facilitate transfer and subsequent disposal at an approved shoreside facility. Temporary or interim storage includes the use of decanting (oil / water separation), as discussed in Section 7.6.2.

For large spills, additional storage capacity will be required for both liquid products and oily-soaked debris, e.g. portable tanks, tank barges, end-dumps, and lined drop-boxes. NRC has agreements with various tank barge operators to provide temporary storage of recovered liquids. NRC also has agreements with vendors to provide portable tanks for recovered liquids. Refineries throughout the Puget Sound region often have tankage available to receive oil/water mixtures.

All recovered oil and oily water mixtures will be transported to an approved shoreside facility for proper disposal.

7.6.2 Decanting and Oil / Water Separation

Decanting is the process of draining off recovered water from portable tanks, internal tanks, collection wells or other storage containers to increase the available storage capacity of recovered oil. When decanting is conducted properly, most of the petroleum can be removed from the water.

Pre-approval for on water decanting is authorized when pumping recovered oil and water ashore is not practical during the first 24 hours after initial spill discovery.
Decanting authorization is granted for the oil products listed below.

- All crude oils;
- Vacuum gas oils;
- Atmospheric gas oils;
- Recycle oils not containing distillates;
- Bunker fuels;
- No. 6 fuel oils;
- Cutter stocks; and
- Coker gas oils.

Decanting of the listed oils is pre-approved if the following conditions are met:

- Pre-Approval is for the first 24 hours after spill discovery. Decanting requests for all the remaining operational periods will need to be submitted to Unified Command.
- The Incident Commander must be notified within one hour of decanting being initiated and must then immediately notify the Unified Command.
- The RP assures the Unified Command that they are quickly obtaining adequate oil storage and skimming capacity within the first 24 hours and the responding Primary Response Contractors (PRCs) are expeditiously getting sufficient storage and skimming capacity on site to alleviate the need for pro-longed decanting

The following criteria found in the current Decanting Authorization Form must be complied with:

- All decanting should be done in a designated "Response Area" within a collection area, vessel collection well, recovery belt, weir area, or directly in front of a recovery system
- Vessels employing sweep booms with recovery pumps in the apex of the boom shall decant forward of the recovery pumps
- Vessels not equipped with an oil/water separator should allow retention time for oil held in internal or portable tanks before decanting commences
- Containment boom needs to be deployed around the collection area, where feasible, to prevent loss of decanted oil or entrainment.
- Visual monitoring of the decanting shall be maintained at all times so that discharge of oil in the decanted water is detected promptly
- Where feasible decant ahead of an operating skimmer recovery system instead of just inside an enclosed boomed area.

Note: Shore-side container decanting (i.e., vacuum truck, portable tanks, etc.) is not authorized for pre-approval under this policy. Decanting in areas where vacuum trucks, portable tanks, or other collection systems are used for shore cleanup will be subject to filling out the decanting form in the NWACP prior to authorization and must comply with the same rules as vessels. Decanting after the first 24 hours or under circumstances not meeting the pre-approval criteria is subject to approval by the Unified Command. Authorization for such decanting must be granted through completion and submission of the Oil Spill Decanting Authorization Form, found in the Northwest Area Contingency Plan, Chapter 4000, Sec. 4650, Figure 7.3.2.

It should be noted incidental returns of oil into the response area, such as oil that falls back into the recovery area from vessels and machinery that are immersed and working in the oil, does not require pre-authorization from the FOSC / SOSC. This practice is currently recognized as a necessary and routine part of mechanical response operations.

Onboard Oily Water Separators:
Larger skimming (recovery) systems incorporate an oil / water separation unit into the total system. The oil / water mixture recovered from the skimming unit is pumped directly to the oily water separator. This special purpose device separates the oil and water. The oil is then pumped to an onboard tank. The separated water is then pumped or drained overboard ahead of the skimming unit.

On-shore Separation:
Because of the large number of transporters and recycling facilities readily available within the state, all recovered oil and oily water mixtures will be transported to an approved shoreside facility for proper disposal. However, in some remote locations, it might be necessary or advantageous to utilize a portable separator (decanting process), described below.

Shoreside separation requires two to three portable tanks, or lined pits.

> TANK ONE: All oil / water mixtures can be pumped as soon as recovery operations are begun. As oil beings to thicken in the tank, it can be skimmed off the top and pumped to an oil storage tank. The level of tank one can be controlled by (1) pumping water off the bottom into the dirty side of the booming and skimming operation, or (2) pumping the water to tank three.

TANK TWO: This will be the primary oil storage tank. The level of this tank should be carefully monitored to determine when the oil needs to be transferred, or additional storage is required.

TANK THREE: This tank would be used as a second stage of separation before returning water back into a very sensitive ecosystem. Water discharged into this tank would first enter through the top of a separator drum, one-half to three-quarter submerged into the tank. Around the bottom the drum would be a series of holes which will let the entering water transit out the bottom of the separator, while collecting residual oil in the top of the separator for later transfer to tank two.

7.6.3 Reclamation

Reclamation of separated oil depends on the type of oil, weathering factors, availability of transportation, and the cost to transport and reclaim. Oil recovered in the early stages of a major spill is generally all reclaimable at local refineries.

7.7 ANIMAL CARCASSES

The disposal of animal carcasses may need to be addressed in the disposal plan. The collection of animal carcasses is the responsibility of the Washington Department of Fish and Wildlife in conjunction with the U.S. Fish and Wildlife Service. Prior to the cleanup of any beach, an agent of the joint trustees should coordinate the removal of oiled carcasses. No oiled carcasses shall be disposed of until authorized by the appropriate natural resource trustee. The Wildlife Branch, in consultation with the trustee agencies, will develop incident specific protocols and authorizations for removing and handling dead oiled animals for each incident. With the approval of local air and health authorities, Ecology recommends incineration of oiled carcasses at a permitted facility.

7.8 OILY DEBRIS

Oily debris recovered during cleanup operations shall be disposed of at an approved shoreside facility. Oily debris generally includes: sorbent pads / boom, sand, rocks, logs, kelp, flotsam, plastics, trash, and disposable / contaminated personal protective equipment, e.g. rain gear.

NOTE: This list is not all encompassing, but generally covers the types of materials collected or generated as a result of an oil spill. Laboratory tests or knowledge of the material must be used to determine if the material designates as dangerous waste. Oily debris that is designated as dangerous waste must be handled in accordance with WAC 173-303.

Most oily debris generated from oil spills has not been designated as dangerous waste in Washington State. Provided the material is classified as a solid waste, the material may be disposed of under the provisions of RCW 70.95 / WAC 173-304.

7.8.1 Reclamation Testing

A. WAC 173-303-300 requires that the owner or operator of a Treatment, Storage or Disposal (TSD) facility shall obtain a detailed chemical, physical, and / or biological analysis before storing, treating, or disposing of a dangerous waste. The purpose of the analysis is to insure that a dangerous waste is properly managed.

B. The analysis may include or consist of existing published or documented data on the dangerous waste, or on waste generated from similar processes, or data obtained by testing, if necessary.

C. Most TSD facilities have their own testing laboratories and other independent testing laboratories are available. See Table 7-2 for a partial listing of those available in the immediate Puget Sound area. For a complete listing, consult the local telephone business directory under CHEMISTS-ANALYTICAL & CONSULTING.

Table 7-2 Independent Testing Laboratories / Chemists—Analytical

1. **SPECTRA Laboratories**
   2221 Ross Way
   Tacoma, WA 98421
   253-272-4850 Phone
   253-572-9838 Fax
   www.spectra-lab.com

2. **Friedman & Bruya, Inc**.
   3012 16th Ave. W.
   Seattle, WA 98119
   206 285-8282 Phone
   800-487-8231 Toll-Free
   206-283-5044 Fax
   http://www.friedmanandbruya.com

3. **OnSite Environmental, Inc.**
   14648 NE 95th Street
   Redmond, WA 98052
   425-883-3881 Phone
   (425) 885-4603 Fax
   http://www.onsite-env.com

4. **TestAmerica Seattle**
   5755 8th Street East
   Tacoma, WA 98424
   253-922-2310 Phone
   253 922-5047 Fax
   http://www.testamericainc.com

5. **Sound Testing**
   2992 SW Avalon Way
   Seattle, WA 98126
   206-932-0206 Phone
   800.451.9792 Toll-Free
   206.937.3848 Fax
   http://soundtestinginc.com

6. **Libby Environmental**
   4139 Libby Rd NE
   Olympia, WA 98506
   360-352-2110 Phone
   360-352-4154 Fax
   http://libbyenvironmental.com

NOTE: For additional listings in local area, consult telephone business directory under: CHEMISTS ANALYTICAL & CONSULTING

7.8.2 Segregation

To minimize the amount of oily debris disposed of at landfills, the oily debris will be segregated as it is collected. Generally, oily debris falls into two categories:

Burnable
REMINDER: See Section 7.7 regarding "ANIMAL CARCASSES"

Non-burnable
Field personnel and / or cleanup contractor(s) must be dedicated to segregating the debris as it is being collected, otherwise the debris will be suitable only for landfilling, and this would defeat the policy of minimizing the use of landfills.

The NRC Incident Commander is responsible to ensure that field personnel and / or cleanup contractors properly identify and segregate all oily debris.

7.8.3 Containers

Oily debris will be placed in leak-proof containers to prevent leakage during handling and transportation. Plastic bags, debris boxes, or other containers lined with plastic are suitable for this purpose. Open-top 55-gallon storage drums that can be sealed after filling are ideal for temporary storage and transportation.

7.8.4 Interim Storage

A. Interim storage sites may be necessary if large quantities of oil or oily debris are recovered.
B. If temporary storage in leak-proof trucks, boxes, bags or containers is not adequate, a bermed pit, double-lined with plastic tarps and visqueen (to prevent soil penetration) may be needed prior to receiving loose and bagged debris.
C. Interim storage sites shall be specifically designated in the incident specific disposal plan. The location of interim storage sites is dependent on the approval of the On-Scene-Coordinator (OSC) and local health department. Prior approval is required. See Section 7.11, Model Disposal Plan, which can be used to facilitate the interim storage and disposal process approval by the Unified Command.
D. Selection of a good interim / temporary storage site should be based on, or include:
    1. Good access to cleanup operations.
    2. Minimum slope, located above the high water mark and away from gullies, streams, etc.
    3. Construction of an earthen berm around the perimeter of the storage site.
    4. Construction of an entrance and exit ramp over the berm to allow access to the storage area.
    5. Deployment of a double thickness plastic liner across the bottom of the storage area to prevent any leakage and contact of oil with and subsequent absorption by the soil. This will also ease demobilization of the interim / temporary site.
E. Burnable and non-burnable materials shall be placed in well-defined separate areas at the interim storage sites.
F. All oily debris shall be covered by secured visqueen or tarps.
G. Storage at the interim site shall not exceed 90 days.
H. When the last of the oily debris leaves an interim storage site, surrounding soil that has become contaminated with oil, shall also be removed. Once the soils have volatilized the organics, they are no longer waste materials and can be used in fill and grade sites.

NRC is licensed to handle interim storage, transportation and final disposal of oily debris.

7.8.5 Transportation

Oily debris shall be hauled in Visqueen (plastic) lined trucks, trains, or other appropriately lined vehicles or vessels. The contaminated materials shall be transported by licensed operators / registered handlers to their respective final disposal sites.

7.8.6 Record Keeping and Reporting

For all contaminated materials being transported to their final disposal sites, a bill of lading or manifest will be utilized to record volume, material and disposition.

7.8.7 Final Disposal

As stated in Section 7.4, it is the general policy to incinerate the oily debris, to the maximum extent feasible, thus reducing the amount of oily debris disposed of at a solid waste landfill.

Burnable Debris:

Hog-Fuel Burners (Boilers):
At one time, this represented the most practical and cost effective method of disposal, since the debris is used as a fuel for various manufacturing processes. However, recent and more stringent air pollution controls have made this a less viable alternative. A complete listing of such facilities in the State of Washington is available from Ecology. Expect to obtain separate approval on a case-by-case basis.

Burnable debris such as oiled logs and sticks can be chipped and burned in an approved hog fuel burner (boiler).The chipped oily debris shall be stored at the hog-fuel burner in such manner as to prevent further environmental contamination. This debris shall be fed into the burner in such a manner as to meet the facility temperature requirements, sulfur dioxide, chloride, and other applicable state standards under the provisions of RCW 70.94 (Clean Air Act).

Solid Waste Incinerators:
At present, there are few available. Generally, the cost will be higher than hog-fuel burners; however, this factor must be weighed against comparative transportation costs, urgency of disposal, test / analysis of debris, etc. See Appendix D for a listing of resources.

Onshore Incineration:

Because of increasingly stringent air pollution standards, coupled with some (although limited) availability of hog-fuel burners and solid waste incinerators, this is not a likely alternative within the State of Washington. If considered a necessary alternative, this method would first require prior approval of the FOSC / SOSC.

This method involves using a trench-type incinerator. The material is transferred into the pit where the forced air incinerator is situated. Open pit burning may be possible in remote areas if an open pit can be excavated and sufficient volatile hydrocarbons are present to maintain combustion.

Concerns to evaluate are: public safety, wildlife degradation and air pollution. Air deployable incinerators can be moved in sections to an onshore location by helicopter, and assembled onsite.

Non-burnable Debris:

Alternatives to landfilling: Use of oily sand and rock in the production of asphalt. Use of volatilized soil in fill and grade sites.

Approved landfill: Non-burnable trash and wet organic debris which normally consists of oiled plastics, oiled seaweed, kelp and other organic material should be transported to a licensed, approved landfill and disposed of in accordance with the landfill guidelines and regulations.

Once the material has been designated as a solid waste and approved for disposal at a licensed landfill, final approval and acceptance of this material is at the discretion of the landfill operator. If this non-burnable debris, after testing, is declared a hazardous material, it must be disposed of as such.

Washington State Department of Ecology, Hazardous Waste and Toxics Reduction Program maintains a current listing of landfills and dangerous waste management facilities. These facilities are also readily known by contractors involved in waste disposal operations. This list can be found on Ecology's web site.

Reference: www.ecy.wa.gov/apps/hwtr/hwsd/default.htm

7.9 NATURAL DEGRADATION

The process of natural degradation can account for the dissipation and breakdown of large volumes of oil released into land and into water under the right combination of conditions. This process relies on natural mechanical energy to break down the oil. Further breakdown of the oil may be accomplished through metabolism of the spilled oil by naturally occurring microorganisms. In some areas such as biologically sensitive shoreline areas where cleanup operations will cause more damage than the oil, natural degradation may be the best alternative for cleanup and disposal.

7.10 RESOURCES

Ecology routinely provides an updated listing of approved Treatment, Storage and Disposal (TSD) facilities, oil recyclers, hog-fuel burners / boilers, landfills, spill-response contractors, etc. If necessary, Ecology (Spill Prevention, Preparedness, and Response Program) can be contacted in Olympia or at one of their four regional offices.

7.11 MODEL DISPOSAL PLAN

The following model disposal is from the NWACP9405 Disposal Guidance for Washington State and Oregon State (January 1, 2019) and is included in the NRC Plan for information and reference as well as potential use. Plan users may also check the NWACP for any updates to the model plan at https://www.rrt10nwac.com/Files/NWACP/2015/Section%209405.pdf

--WASHINGTON--

Incident Waste Management and Disposal Plan

(Incident Name)

Responsible Party: _____
Spilled Material: _____
Spill Volume (estimate): _____
Spill Location: _____
Spill Date/Time: _____
Report Update Time: _____

The Disposal Plan has been developed by the Environmental Unit in coordination with the Operations Section for incorporation into the Incident Action Plan. This plan may be amended as necessary to ensure compliance with all applicable laws and regulations, as new materials or waste streams are encountered, or alternative means of disposal are needed. Amendment may occur only upon mutual agreement of the responsible party, the Federal OSC (USCG/EPA), and/or the State OSC (Ecology/DEQ).

Submitted By: _____ Date: _____

Approved by SOSC: _____ Date: _____

Reviewed by USCG/EPA: _____ Date: _____

Approved by Responsible Party: _____ Date: _____

Approved by other Local Government Representative(s): _____ Date: _____

Approved by other Tribal Government Representative(s): _____ Date: _____

SECTION I: ANTICIPATED RESPONSE TACTICS, WASTE STREAMS AND DESIGNATION OF SPILLED MATERIAL

Attached to this plan is a completed Waste Stream Analysis Form. This form is used to determine the waste streams that will be generated from the response tactics approved for the incident, and to

☐ The spilled material was deemed (non-) dangerous waste based on the following:

☐ Sampling will be/has been conducted. A separate sampling plan is being developed.

Safety Data Sheet attached

SECTION II: WASTE COLLECTION AND SEGREGATION

Waste will be collected and kept segregated to facilitate final disposal and for use in determining the volume spilled and recovered. The following measures will be taken:

Interim Waste Storage Areas have been established at these locations:

Name and Address	Waste Type	

☐ The Environmental Unit has evaluated the interim storage sites for potential existence of resources at risk and has considered the need for any required consultations or modifications.

The following conditions will be met at each site:

These measures will be used to return the interim storage sites to their original condition at the end of the response:

B. INTERIM ON WATER STORAGE OF LIQUID MATERIALS

Describe skimmers and barges

C. INTERIM SHORESIDE/NEARSHORE STORAGE OF LIQUID MATERIALS

Describe nearshore recovery operations for liquids and describe shoreside storage

SECTION III DECANTING

Describe decanting operations, if applicable. Attach decanting authorization form (if approved).

SECTION IV: WASHINGTON STATE OIL RECOVERY CREDIT FOR NATURAL RESOURCE DAMAGES

If the responsible party will seek credit for oil recovery under Washington State's Natural Resource Damage Assessment (RDA) process, additional segregation is required for product collected during the first 24 hours (non-persistent oils) or 48 hours after the oil release (persistent oils) (some conditions apply such as effectively contained and off of shoreline). Detailed guidance on the credit and segregation/measurement methods can be obtained from the Washington Department of Ecology document "Credit for Oil Recovery," and WAC 173-183 (WAC 173-183-870). Also see Washington Department of Ecology document "Compensation Schedule Credit for Oil Recovery, RDA Committee Resolution 96-1".

☐Check this box if the Responsible Party intends to seek Washington State recovery credit, and seek advice from an Ecology representative on how to XXXX

Segregation description here if using the state

Reference to wildlife plan for animal carcasses

SECTION VII: WASTE GENERATED DURING WILDLIFE OPERATIONS

A. Wildlife Collection and Rehabilitation

Oiled wildlife waste, such as oily PPE, towels, caging, and wash water generated from oiled wildlife response and rehabilitation activities are addressed in this plan.

The search, collection, and rehabilitation of oiled wildlife can be a lengthy process. Depending on the scope and scale of impacted wildlife, waste material from oiled wildlife collection and rehabilitation activities are likely to be generated several days, weeks, or even months after other oil spill response operations have ended.

Liquid Waste

Wildlife Rehabilitations operation currently anticipate the generation of (insert the number of tanks here) 21,000 gallon "Baker" or other water storage tanks of oily wash water that will need to be switched out every (insert the frequency in days here) days.

Solid Waste

Wildlife Rehabilitation operations currently anticipate the generation of (insert the number of roll off boxes here) of 30 cubic yard sealed roll-off drop boxes that will require change out every (insert the frequency in days here days).

Biohazard Waste

Wildlife Rehabilitation operations currently anticipate the generation of (insert the number of sharps containers here) of (insert the size of the containers here) size sharps containers and (insert the number of biohazard containers here) of (insert the size of the containers here) biohazard containers that will require disposal and replacement every (X#) days.

B. Wildlife Carcasses

No oiled carcasses can be disposed of until authorized by the Operations Section Wildlife Branch. The disposal of animal carcasses is coordinated through the Wildlife Branch in the Operations Section. Operations Staff should remove any dead oiled wildlife from the environment that they encounter during their normal cleanup operations and notify the Wildlife Branch. Any carcasses collected should be placed in a bag, separate from other debris, with a label identifying:

- The team leader of the operation that collected the carcass
- The time the carcass was collected
- The date the carcass was collected
- The location (GPS coordinates would be preferred) of collection if possible.

Notify the Wildlife Branch of carcasses that are collected. If carcasses cannot be collected due to time and/or safety considerations their locations and numbers should be recorded so that they can be tallied and reported to the Wildlife Branch.

SECTION VIII: WASTE TREATMENT AND FINAL DISPOSAL

Waste to be recycled will be treated and disposed of by Waste to be reused will be treated and disposed of by:

Waste to be incinerated will be treated and disposed of by:

Waste to be disposed of at a landfill will be treated and disposed of by:

Wildlife waste will be treated and disposed of by:

Biohazard Waste will be collected and segregated by

SECTION XI: WASTE MANAGERS, HANDLERS AND PERMITS

The following positions will be assigned to manage the generation, storage and disposal of waste for this response:

- **Disposal Group Supervisor**
- **Technical Specialists**

The following response contractors, licensed transporters, approved treatment and disposal facilities are to be used for waste handling and disposition unless otherwise directed by Incident Command.

Name of Company	Disposal Function	Company Representative (Name, Phone #)

☐Permits for this response are being tracked in a separate document by the Environmental Unit.

☐The Liaison Officer and the Joint Information Center have been briefed on this plan and provided information in order to respond to questions from the public.

SECTION X: WASTE TRACKING FORMS

All waste oils, regardless of type, must be managed by a complete set of records. These records should show the following:

- where the waste was recovered,
- the type of waste,
- approximate volume,
- date collected,
- date transported to staging or disposal site,
- date received at temporary storage area or disposal site,
- the number of containers shipped, the number of containers received,
- the date, location and method of final disposal.

Include copies of waste tracking forms and waste profiles used for final disposal, (See Attachment A for example). Also, include copies of receipts from disposal facilities.

WASTE MANAGEMENT TRACIKING FOR INCIDENT: _____

Time:_____

Recovery Locations (s)	Time Recovered		Volume (Gallons*)	Type of Waste	Projected Interim Storage Demand **
	From:	To:			

* Cubic Yards for Solids

** Means to address demand per location per time

INTERIM STORAGE TRACKING

Interim Storage Locations(s)	Received from Locations(s)	Time Received	Volume (Gallons*)	Type of Waste

* Cubic Yards for Solids

FINAL DISPOSAL

Interim Storage Locations(s)	Received from Locations(s)	Time Received	Volume (Gallons*)	Type of Waste

* Cubic Yards for Solids

--OREGON—

Incident Waste Management and Disposal Plan

(Incident Name)

Incident Name _____
Responsible Party _____
Spilled Material _____
Spill Location _____
Spill Date/Time _____
Spill Source (vessel, vehicle, etc.) _____

This plan has been prepared by the Planning Section at the request of the Incident Command. All applicable state, local, and federal laws and regulations are to be followed when collecting, managing, recycling and/or disposing of the recovered materials. Wastes generated through cleanup operations will be tracked to provide an accurate means o estimating total recovery. All materials will be categorized, segregated and a determination of the regulatory status (hazardous waste versus solid waste) will be made for each waste stream. Materials will be itemized for safe and efficient collection, staging, storage, and recycling or disposal. All materials will be tracked to provide an accurate means of estimating the quantities of disposed or recycled materials and to provide documentation of final disposition.

This plan may be updated as necessary to ensure compliance with all applicable laws and regulations as new materials or waste streams are encountered, or as alternative means of disposal are needed. Once approved by Incident Command and incorporated into the Incident Action Plan, this plan will remain in force until superseded by a newer version or the cessation of response activities and completion of waste disposal activities.

At the outset of recovery operations, this plan will be used to document staging areas and waste management organization elements until information on wastes generated is obtained. The plan will be updated and expanded as waste management operations develop.

Plan Authorization	**Signature**	**Date**
Approved by USCG/EPA:	_____	
Approved by ODEQ:	_____	
Approved by Responsible Party:	_____	
Approved by Local Government Representative:	_____	
Approved by Tribal Government Representative:	_____	
Drafted and submitted for approval by:	_____	

SECTION I: Waste Management Organization

This section describes the personnel assigned and key roles staffed in the Incident Command Post within the Operations Section to support waste management and disposal. The Waste Tracking Coordinator is responsible for collecting information from the Waste Staging Area Manager(s) to provide daily updates on the quantity of wastes generated, staged, transported and disposed. The Technical Specialist is responsible for making waste determinations and designations to be used for proper waste handling and disposal.

	Name	Agency/Company
Disposal Group Supervisor	_____	
Waste Tracking Coordinator	_____	
Waste Management Tech Specialist	_____	

SECTION II: Waste Segregation, Waste Stream Descriptions and Designations

This section describes how the wastes generated during spill cleanup operations will be categorized for segregation, waste determination and the basis for the waste determination. It is the responsibility of the Waste Management Tech Specialist to perform the waste designations for proper disposition. Copies of waste profiles and supporting laboratory analyses used to make the waste determinations shall be maintained by the Waste Tech Specialist and incorporated into the response file at the conclusion of the response.

Waste Description & Origin	**Determination**	**Basis / HW Profile ID**
Example: Oiled Sorbents from On-Water Recovery in Division B	*Non-Hazardous Solid Waste*	*Hazardous Waste Profile #1 Non-Hazardous*

SECTION III: Waste Staging Areas

This section describes the areas designated by the Operations Section Chief (or Disposal Group Supervisor) and an assigned Waste Staging Area Manager to support waste management and disposal.

Waste Staging Area Name	Address (or Lat/Long in DecDeg)	Manager/Phone
Ex: Camas Staging Area #1 (Camas-1)	*18045 Columbia River Hwy Camas, WA*	*Mack Buck*
		206-222-2222

Map of Waste Staging Areas

Insert Map showing staging areas here….

SECTION IV: Description of Waste Management Processes/Controls

This section describes the general processes for managing each waste stream at each Waste Staging Area. Describe how each site was constructed, bermed, covered, etc. to minimize spread of contaminants and impacts to site soils or adjacent areas. This portion of the plan will be used to guide waste management and must be updated as processes/waste streams change. Actual waste tracking will be accomplished via separate tracking spreadsheets (see Incident Waste Tracking tab on electronic version), where the waste profile for each waste stream/container will be documented.

Waste Staging Area	Tank/Box/Tote/etc.	Waste Type/Source	Site Controls
Ex: Camas-1, Liquids Storage Area	*Poly Tank #1* *Poly Tank #2*	*Oil/Water Mix from On-Water Recovery in Division B*	*Bermed containment surrounding tanks, collection of rainwater runoff to separate tank*

Waste Descriptions/Types
Oily Water
Oiled Debris (woody debris, sand, etc.)
Oiled Sorbents (Oiled Solid Wastes)
Solid Waste (PPE, etc.)
Recovered Source Oils (Pure Product)
Recovered Oils (Product with Water)

SECTION V: Waste Tracking/Reporting System

This section documents how wastes generated during the response will be tracked and establishes the inventory process and reporting schedule used to inform Incident Command. Typically, the Waste Tracking Coordinator is responsible for establishing the process and schedule for waste monitoring and reporting at each Waste Staging Area. The Waste Staging Area Manager is responsible for carrying out the waste monitoring as received into staging, directing wastes to the proper storage/containment area, and overall management of wastes while being accumulated, stored and while being loaded for offsite transport.

Waste Tracking Coordinator Responsibilities:

Wastes will be tracked throughout the response to account for generation, staging/accumulation, transfer and final disposition. The tracked wastes will be summarized daily for incorporation into ICS Form 209, to provide Incident Command with a summary of recovered waste volumes and any problems with the waste management system.

All copies of waste tracking forms, waste profiles used for waste determinations, and final disposition records/receipts will be maintained by the Waste Tracking Coordinator for incorporation into a Waste Management Summary Report at the conclusion of the response, unless interim reports are requested form Incident Command.

The Waste Tracking Coordinator will supply paper copies of Waste Tracking Forms for use by the West Staging Area Manager and establish a schedule for reporting of waste materials inventory and the transfer of all manifest copies, bills of lading, etc. (typically at the conclusion of the days operations). The Waste Tracking Coordinator will transfer information form the paper Waste Tracking Forms into an Incident Waste Tracking Spreadsheet and convey information to the Situation Unit for incorporation into the ICS 209 Form.

Waste Track Forms:

Separate Waste Tracking Forms will be used for Solid and Liquid Materials Generation, and Waste Materials Transfers to Recycling or Disposal Facilities. See attached paper forms used to track wastes at the Waste Staging Areas. The Waste Tracking Forms (and this plan template) are available in electronic format from Oregon Dept. of Environmental Quality – Emergency Response Program.

Waste Staging Area Manager Responsibilities:

Wastes generated during recovery and cleanup operations are received at the designated Waste Staging Area, directed to the proper containment (box, tank, etc.) and entered on Waste Tracking Sheet(s). The Waste Staging Manager will record the receipt of cleanup generated wastes on the Waste Tracking Forms provided by the Waste Tracking Coordinator, and provide updates/records of the wastes received, in storage, and transferred for disposition on a daily schedule established by the Waste Tracking Coordinator. The Waste Staging Manager is responsible for the proper storage during accumulation, and proper packaging and preparation of Uniform Hazardous Waste Manifests for each shipment.

Daily Inventory and Reporting Schedule:

A physical inventory will be conducted at the conclusion of daily operations and recorded on the provided Waste Tracking Forms. The Waste Tracking Forms and all receipts, bills of lading, records of manifests, etc. will be transmitted to the Waste Tracking Coordinator by beginning of the next operational period.

Submit copies of the Waste Tracking Forms, Bills of Lading, uniform Hazardous Waste Manifests, et. To the Waste Tracking Coordinator by the beginning of the next Operational Period. For this response, the Operational Period is 24 hours and begins at 0700.

SECTION VI: Designated Waste Transporters

This section designates which licensed waste transporters will be used to transport wastes from each Waste Staging Area and the destinations for each waste stream. The Waste Staging Area Manager is responsible for monitoring waste transport activities at the Waste Staging Areas, and documenting the time each transport was initiated. Actual waste transactions will be documented in the Waste Tracking Sheets designated for use by the Waste Tracking Coordinator.

Transport Company	Waste Type	Transport Type	Destination
Ex: Clean Water Mobile	*Oil/Water Mix*	*Tanker Truck*	*Oil Recovery Inc.*

SECTION VII: Designated Waste Disposal/Recovery Facilities

This section designates the facilities that will be used to accomplish reuse, recovery, or disposal of wastes generated during cleanup activities. This general plan identifies the various waste streams, organized by the Waste Types stored at each Waste Staging Area, the destination Facility and the type of material recovery/disposal that will occur there. This general listing will guide the disposal process, but actual waste transfers must be recorded on the Waste Tracking Sheets.

Waste Staging Area	Waste Type	Facility	Recovery/Disposal Type
Ex: Camas Staging Area #1	*Oil/Water Mix*	*Oil Recovery Inc.*	*Fuel Reclamation*

8. TRAINING AND EXERCISES

Contents

8.1 PURPOSE

This chapter provides details of the training standards for various response personnel, and a general schedule for exercising the plan as a response organization.

Emergency preparedness is a continuous process with these integral functions:

- Planning
- Training
- Exercising
- Lessons learned

8.2 SCOPE

All personnel involved in oil spill response operations where they may come into direct contact with the spilled product, and/or enter the exclusion zone, must have an appropriate level of OSHA/WISHA required training. Safety regulations are strictly enforced by federal and state authorities. A summary of the various training levels is contained in Section 8.8.

NRC will ensure that their employees and subcontractors meet the applicable OSHA/WISHA training requirements and safety standards. State and Federal OSCs are responsible for ensuring that their respective agency personnel meet the applicable OSHA/WISHA training requirements and safety standards. The Unified Command, as represented by the designated Command Staff Safety Officer, is ultimately responsible to ensure that all personnel on scene comply with applicable OSHA/WISHA regulations.

8.3 LAWS AND REGULATIONS

Numerous federal requirements related to oil spill response are contained in OSHA. See 29 CFR 1910.120 for details. Washington State WISHA regulations regarding Hazardous Waste Operations and Emergency Response have been codified in WAC 296-62-300 and WAC 296-824-100.

8.4 RIGHT TO KNOW (Hazard Communication)

The Right to Know occupational safety and health standard is intended to comprehensively address the issue of evaluating the potential hazards of chemicals, and communicating information concerning hazards including appropriate protective measures to employees. Each organization must develop and maintain a written hazard communication program for the workplace, including lists of hazardous chemicals present, labeling of containers of chemicals in the workplace, as well as containers of chemicals being shipped; the distribution of safety data sheets to employees, and the development and implementation of employee training programs regarding hazards of chemicals and protective measures.

8.5 STANDARDS FOR RESPONSE PERSONNEL

Under the OSHA regulation in 29 CFR 1910.120, Hazardous Waste Operation and Emergency Response, this rule regulates the safety and health of employees involved in clean-up operations at:

1. "Uncontrolled" hazardous waste sites, i.e. sites specified as superfund removal and remediation sites, RCRA corrective action sites and other operations required by federal or state law.
2. Treatment, storage and disposal (TSD) facilities.
3. Emergency responses to releases, or threats of releases.

Program and training requirements vary for each category. For the purpose of oil spill response personnel and operational training the following material will focus on the training requirements for emergency responses to releases or threats of releases, under 29 CFR 1910.120.

Pursuant to 29 CFR 1910.120(e), all employees working on site (such as, but not limited to, equipment operators, general laborers and others) exposed to hazardous substances, health hazards, or safety hazards, and their supervisors and management responsible for the site, shall receive training that meets the requirements of this paragraph before they are permitted to engage in hazardous waste operations that could expose them to hazardous substances, safety, or health hazards. Employees shall not be permitted to participate in or supervise field or command post activities until they have been trained to a level required by their job function and responsibility.

The training shall thoroughly cover the following:

1. Names of personnel and alternates responsible for site safety and health;
2. Safety, health and other hazards present on the site;
3. Use of personal protective equipment;
4. Work practices by which the employee can minimize risks from hazards;
5. Safe use of engineering controls and equipment on the site;
6. Medical surveillance requirements, including recognition of symptoms and signs which might indicate overexposure to hazards; and
7. The contents of the site safety and health plan.

Reference: Additional safety training guidelines are provided in ASTM Standards F1656-01 and F1644-01.

In addition to this important safety and health training, the NRC Spill Management Team will have the appropriate ICS training, training in NWACP policy, use and location of GRPs (if appropriate) and in the NRC Plan. This training is outlined in Table 2-1 in Chapter 2.

New employees will receive the training required by WAC 173-182-280(2) before being assigned job responsibilities which require participation in an emergency situation.

8.6 EMERGENCY RESPONSE TO HAZARDOUS SUBSTANCES

All employers and employees engaged in emergency response to hazardous substance releases are subject to the full requirements of 29 CFR 1910.120(q), except those involved in clean-up operations at uncontrolled hazardous waste sites, sites covered by RCRA, or TSD facilities.

8.7 ELEMENTS OF AN EMERGENCY RESPONSE PLAN

Employers are responsible for developing an emergency response plan for emergencies which should address the following, as a minimum, to the extent that they are not addressed elsewhere:

1. Pre-emergency planning and coordination with outside parties
2. Personnel roles, lines of authority, training, and communication
3. Emergency recognition and prevention
4. Safe distances and places of refuge
5. Site security and control
6. Evacuation routes and procedures
7. Decontamination
8. Emergency medical treatment and first aid

9. Emergency alerting and response procedures
10. Critique of response and follow-up
11. Personal Protective Equipment (PPE) and emergency equipment
12. Emergency response organizations

Training shall be based on the duties and functions to be performed by each responder of an emergency response organization. The skills and knowledge levels required for responders shall be conveyed through training before responders are permitted to take part in actual emergency operations or incident.

8.8 SPECIFIC TRAINING LEVELS

8.8.1 First Responder Awareness Level

First responders at the awareness level are individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release. They would take no further action beyond notifying the authorities of the release. First responders at the awareness level shall have sufficient training or have had sufficient experience to objectively demonstrate competency in the following areas:

- An understanding of what hazardous materials are, and the risks associated with them in an incident
- An understanding of the potential outcomes associated with an emergency created when hazardous materials are present
- The ability to recognize the presence of hazardous materials in an emergency
- The ability to identify the hazardous materials, if possible
- An understanding of the role of the first responder awareness individual in the employer's emergency response plan including site security and control and the U.S. Department of Transportation's Emergency Response Guidebook
- The ability to realize the need for additional resources, and to make appropriate notifications to the communication center

Training Time: not specified

8.8.2 First Responder Operations

First responders at the operations level are individuals who respond to releases or potential releases of hazardous substances as part of the initial responses to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release. They are trained to respond in a defensive fashion without actually trying to stop the release. Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposure. First responders at the operations level shall receive training or demonstrate competency in the areas listed for the awareness level in addition to:

- Knowledge of the basic hazard and risk assessment techniques
- Know how to select and use proper personal protective equipment provided to the first responder operational level
- An understanding of basic hazardous materials terms

- Know how to perform basic control, containment and/or confinement operations within the capabilities of the resources and personal protective equipment available with their unit
- Know how to implement basic decontamination procedures
- An understanding of the relevant standard operating procedures and termination procedures

Training Time: 8 hours

8.8.3 Hazardous Materials Technicians, 29 CFR 1910.120(q)(6)(iii)

Hazardous materials technicians are individuals who respond to releases or potential releases for the purpose of stopping the release. They assume a more aggressive role than a first responder at the operations level in that they will approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance. Hazardous materials technicians shall have received at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas and the employer shall so certify:

- Know how to implement the employer's emergency response plan
- Know the classification, identification and verification of known and unknown materials by using field survey instruments and equipment
- Be able to function within an assigned role in the Incident Command System
- Know how to select and use proper specialized chemical personal protective equipment provided to the hazardous materials technician
- Understand hazard and risk assessment techniques
- Be able to perform advance control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available with the unit
- Understand and implement decontamination procedures
- Understand termination procedures
- Understand basic chemical and toxicological terminology and behavior

Training Time: 24 hours

8.8.4 On-Scene Incident Commander, 29 CFR 1910.120(q)(6)(v)

Incident Commanders, who will assume control of the incident scene beyond the first responder awareness level, shall receive at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas and the employer shall so certify:

- Know and be able to implement the employer's incident command system
- Know how to implement the employer's emergency response plan
- Know and understand the hazards and risks associated with employees working in chemical protective clothing
- Know how to implement the local emergency response plan
- Know of the state emergency response plan and of the Federal Regional Response Team
- Know and understand the importance of decontamination procedures

Training Time: 24 hours

8.8.5 Refresher Training, 29 CFR 1910.120(q)(8)(i)

Individuals who are trained in accordance with 29 CFR 1910.120(q)(6) shall receive annual refresher training of sufficient content and duration to maintain their competencies in these areas at least yearly.

8.8.6 Spill Management Team Training WAC 173-182-280 (2)

Spill Management Team members will receive at minimum, yearly refresher training on ICS, NWACP Polices, the use and location of GRPs, contents of the NRC Plan, and the health and safety of workers. The training will be part of the annual exercise program. All new SMT members will complete the training program prior to having responsibilities assigned in an emergency response situation.

8.9 TRAINING EXERCISES UNDER 29 CFR 1910.120(q)

OSHA has included several exceptions to the emergency response standard whereby workers can be qualified to work in emergency response incidents.

8.9.1 Skilled Support Personnel, 29 CFR 1910.120(q)(4)

Personnel, not necessarily an employer's own employees, who are skilled in the operation of certain equipment, such as mechanized earth moving or digging equipment or crane moving or digging equipment or crane and hoisting equipment, and who are needed temporarily to perform immediate emergency support work that cannot reasonably be performed in a timely fashion by an employer's own employees, and who will be or may be exposed to the hazards at an emergency response scene, are not required to meet the training in this paragraph for the employer's regular employees. However, these personnel shall be given an initial briefing at the site prior to their participation in any emergency response. The initial briefing shall include instruction in the wearing of appropriate personal protective equipment, what chemical hazards are involved, and what duties are to be performed. All other appropriate safety and health precautions provided to the employer's own employees shall be used to assure the safety and health of these personnel.

8.9.2 Specialist Employee, 29 CFR 1910.120(q)(5)

Employees who, in the course of their regular job duties, work with and are trained in the hazards of specific hazardous substances, and who will be called upon to provide technical advice or assistance at a hazardous substance release incident to the individual in charge, shall receive training or demonstrate competency in the area of their specialization annually.

8.9.3 Post Emergency Response Cleanup

For oil spill cleanup where cleanup is that portion of the emergency response after the immediate threat of a release has been stabilized or eliminated and cleanup of the site has begun, a minimum of 4-hours training is considered adequate. Post-emergency low hazard training requires that:

- Cleanup is performed in a fully characterized area of low hazard
- Health risks from skin absorption are minimal
- Employees have completed Hazard Communication training in 29 CFR 1910.38(a) and 1910.1200
- Employees have received site specific training in operating procedures, decon procedures, water safety, hypothermia, heat stress, and safety hazard controls
- Supervisors meet the requirements of 29 CFR 1910.120(e)(4)

8.9.4 Post Emergency Response Operations, 29 CFR 1910.120(q)(1)

Upon completion of the emergency response, if it is determined that it is necessary to remove hazardous substances, health hazards, and materials contaminated with them (such as contaminated soil or other elements of the natural environment) from the site of the incident, the employer conducting the clean-up shall comply with one of the following:

1. Meet all of the requirements of paragraphs (b) through (o) of 29 CFR 1910.120, or

2. Where the cleanup is done on plant property using plant or workplace employees, such employees shall have completed the training requirements of the following: 29 CFR 1910.38(a); 1910.134; 1910.1200, and other appropriate safety and health training made necessary by the tasks that they are expected to perform such as personal protective equipment and decontamination procedures.

All equipment to be used in the performance of the cleanup work shall be in serviceable condition and must be inspected prior to use.

8.9.5 General Site Workers, 29 CFR 1910.120(e)(3)

General site workers (such as equipment operators, general laborers and supervisory personnel) engaged in hazardous substance removal or other activities which expose or potentially expose workers to hazardous substances and health hazards shall receive a minimum of 40 hours of instruction off the site, and a minimum of three days actual field experience under the direct supervision of a trained, experienced supervisor. This category of training also applies to any non-general site workers required to wear a respirator, pursuant to 29 CFR 1910.120(e)(3)(iv). Training Time: 40 hours plus 3 days field experience

8.9.6 Management and Supervisors, 29 CFR 1910.120(e)(4)

On-site management and supervisors directly responsible for, or who supervise employees engaged in, hazardous waste operations shall receive 40 hours initial training, and three days of supervised field experience (the training may be reduced to
24 hours and one day if the only area of their responsibility is employees covered by 29 CFR 1910.120(e)(3)(ii) and (iii) and at least eight additional hours of specialized training at the time of job assignment on such topics as, but not limited to, the employer's safety and health program and the associated employee training program, personal protective equipment program, spill containment program, and health hazard monitoring procedure and techniques.

8.9.7 Annual Refresher, 29 CFR 1910.120(e)(11.9.7.8)

For all employees (such as but not limited to equipment operators and general laborers) exposed to hazardous substances, health hazards, or safety hazards, and on-site managers and supervisors directly responsible for or who supervise employees engaged in hazardous waste operations.

8.9.8 Equivalent Training, 29 CFR 1910.120(e)(9): WAC 296-62- 3040(9.

OSHA and WISHA regulations permit employers who can show by an employee's work experience and / or training that the employee has had initial training equivalent to that required, shall be considered as meeting those initial training requirements.

8.10 EXERCISING THE NRC PLAN PRC

8.10.1 Testing Internal Notification Procedures

NRC shall test and document internal notification procedures at least once every 90 days. This involves those organizational elements listed in Chapter 3 (Spill Response Organization). Such tests are only required to involve notification, not actual deployment. Typically one annual notification will be done outside of normal business hours. Notifications completed for actual spill response may be used in compliance with notification test procedures, provided they are properly documented using the notification log.

8.10.2 Annual Exercises

NRC commits to Washington State's drill program for the NRC Plan. NRC also commits to working closely with Ecology to design drill scenarios and ensure drill requirements are met. NRC will conduct and document one table-top or incident command post exercise and two deployment exercises per year. NRC also commits to a triennial deployment of wildlife equipment and an ERTV call, per WAC 173-182-710. These drills will be conducted on a triennial cycle following the Washington drill program guidelines. One WCS scenario shall be exercised during the triennial cycle. NRC will conduct post-spill reviews following drills to capture lessons learned, identify training needs and any revisions needed to improve the NRC Plan. NRC will utilize a systematic approach over time to involve all SMTs listed in NRC Plan Covered Vessel Data Forms in tabletops and deployments.

Response to actual spills may be used in part as credit for spill exercises. In such cases, NRC will provide a letter requesting drill credit and any needed supporting documentation to Ecology.

A. PRIMARY RESPONSE CONTRACTOR

The NRC Plan utilizes the following Primary Response Contractor (PRC) to meet all Washington State contingency plan spill response requirements for Covered Vessels:

NRC

24-Hour: 631-224-9141 or 1-877-880-4672

Address: 9520 10th Ave. S., Ste 150
Seattle, WA 98108

Telephone: 206-607-3000

Fax: 206-607-3001

Contact: Ryan McCoy
Regulatory Specialist
Phone: 646-335-2669
Email: rmccoy@republicservices.com

Web Site: http://www.nrcc.com

NRC is a registered / approved PRC with Ecology. NRC is prepared to begin mobilization of personnel and equipment within one hour of notification. NRC has access to over 300 trained spill response personnel in Washington, Oregon and California, and a network of related sub-contractors. NRC also has the experience and capability to train laborers, on short notice, to meet any operational or OSHA / WISHA regulatory standards. In a typical spill response situation, most equipment and vessel operators, and a limited number of HAZWOPER trained laborers, will come from within the immediate vicinity or region. Additional personnel, particularly 100+ HAZWOPER trained laborers, can be flown in from California within 12-24 hours of notification, if necessary.

See the NRC PRC Application for further details on capabilities and services.

See the attached NRC Planning Spreadsheets issued by Ecology for further details.

A complete listing of NRC response equipment can be found on the WRRL at http://www.wrrl.world/

Plan Holder: National Response Corporation Oil Spill Contingency Plan (NRC)

Planning Standard Summary Analysis: WAC 173-182-395 Neah Bay Planning Standard

The summary analysis spreadsheet is based on a conceptual model of equipment that would be available based on the guidelines set forth in WAC 173-182 for; planning standards, determining effectiveness of recovery systems, documenting compliance with planning standards, and plan evaluation criteria. Actual times and performance in spills will depend on the conditions of the day. An electronic version of the equipment detail spreadsheet which lists all equipment can be made available by Ecololgy upon request.The planning standard summary analysis indicates total access to boom, storage and recovery resources required to meet the planning standard. Equipment access is based on information listed on the WRRL and information provided through the plan holder contingency plan and Primary Response Contractor applications as of 9/28/2022. This information is subject to change as additional equipment is acquired and/or relocated. Substantive changes will result in an update of the spreadsheets.

PRC(s): NRCNW

Plan Holder owned equipment: YES, NRC equipment

Worst Case Spill Volume (bbls): 813,000

Oil Products Handled by Group (Group 1-5): I-4

Mutual Aid/Letters Of Intent: Appendix B

Analysis point description: Planning Standard Area

Marine 50% or Freshwater 65% shore side storage credit (YES/NO?): No shoreside storage credit applied. NRC maintains letters of intent for barges of opportunity assets. Barge providers, capacities and LOIs can be viewed in Appendix B of the NRC contingency plan.

Alternative Planning Standard: An alternative has been provided to address an on-water storage GAP for the 6 hour standard. The on water storage requirement for the 6 hour standard is 12,500 barrels. This would require a large barge to be moored in Neah Bay area. Currently there are infrastucture limitations that prevent a barge from being moored in Neah Bay. Therefore an alternative has been provided that includes resident skimming capability via a Elastic X-150 Skimmer and placement of a shallow water barge at the Neah Bay Marina. The alterntative is presented in greater detail on page 5-11 of the NRC Oil Spill Contingency Plan.

	On-water Storage (bbls)	Shore side Storage (bbls)	Total Storage (bbls)	Calm Water (EDRC)	Protected Water (EDRC)	Open Water (EDRC)	Total Recovery (EDRC)	B1 Boom (ft)	B2 Boom (ft)	B3 Boom (ft)	Total Boom (ft)	Personnel (12 hour shift)
2 hr available	858	0	858	0	0	2,427	2,427	3,300	1,200	0	4,500	11
2 hr required			0				0				1,000	
meets standard			**Yes**				**Yes**				**Yes**	
3 hr available	1,296	0	1,296	840	0	12,027	12,867	3,300	2,200	0	5,500	23
3 hr required			0				0				3,000	
meets standard			**Yes**				**Yes**				**Yes**	
4 hr available	3,200	0	3,200	840	0	12,027	12,867	3,300	7,200	0	10,500	33
4 hr required			0				0				3,000	
meets standard			**Yes**				**Yes**				**Yes**	
6 hr available	3,400	140	3,540	1,018	686	15,044	16,748	4,000	13,400	0	17,400	66
6 hr required			12,500			12,500	12,500	4,000			9,000	
meets standard			**ALT**			**Yes**	**Yes**	**Yes**			**Yes**	
12 hr available	65,791	778	66,569	3,788	17,335	38,616	59,739	8,500	49,500	3,400	61,400	211
12 hr required			54,000			21,600	36,000				29,000	
meets standard			**Yes**			**Yes**	**Yes**				**Yes**	
24 hr available	95,808	898	96,706	4,546	18,775	38,616	61,937	8,675	54,100	5,400	68,175	235
24 hr required			96,000				48,000				49,000	
meets standard			**Yes**				**Yes**				**Yes**	
48 hr available	95,808	898	96,706	4,546	18,775	38,616	61,937	8,675	54,100	5,400	68,175	235
48 hr required			96,000				60,000				49,000	
meets standard			**Yes**				**Yes**				**Yes**	

Plan Holder: National Response Corporation Oil Spill Contingency Plan (NRC)

Planning Standard Summary Analysis: WAC 173-182-390 Dungeness Planning Standard

The summary analysis spreadsheet is based on a conceptual model of equipment that would be available based on the guidelines set forth in WAC 173-182 for; planning standards, determining effectiveness of recovery systems, documenting compliance with planning standards, and plan evaluation criteria. Actual times and performance in spills will depend on the conditions of the day. The planning standard summary analysis indicates total access to boom, storage and recovery resources required to meet the planning standard. Equipment access is based on information listed on the WRRL and information provided through the plan holder contingency plan and Primary Response Contractor applications as of 9/28/2022. This information is subject to change as additional equipment is acquired and/or relocated. Substantive changes will result in an update of the spreadsheets.

PRC(s): NRC

Plan Holder owned equipment (yes/no): YES, NRC equipment

Worst Case Spill Volume (bbls): 813,000

Oil Products Handled by Group (Group 1-5): Group 1 through Group 5, lightest products are condensates, heaviest products are crude oils

Mutual Aid/Letters Of Intent: Appendix B

Analysis point description: Planning Standard Area

Marine 50% or Freshwater 65% shore side storage credit (YES/NO?): No shoreside storage credit applied. NRC maintains letters of intent for barges of opportunity assets. Barge providers, capacities and LOIs can be viewed in Appendix B of the NRC contingency plan.

Alternative Planning Standard: N/A

	On-water Storage (bbls)	Shore side Storage (bbls)	Total Storage (bbls)	Calm Water (EDRC)	Protected Water (EDRC)	Open Water (EDRC)	Total Recovery (EDRC)	B1 Boom (ft)	B2 Boom (ft)	B3 Boom (ft)	Total Boom (ft)	Personnel (12 hour shift)
2 hr available	100	0	100	356	0	0	356	0	1,000	0	1,000	8
2 hr required			0				0				1,000	
meets standard			**Yes**				**Yes**				**Yes**	
3 hr available	200	0	200	356	0	0	356	0	5,000	0	5,000	20
3 hr required			0				0				3,000	
meets standard			**Yes**				**Yes**				**Yes**	
6 hr available	34,280	320	34,600	1,178	5,920	23,570	30,668	3,000	32,400	4,400	39,800	128
6 hr required			12,500			6,250	12,500	3,000			10,000	
meets standard			**Yes**			**Yes**	**Yes**	**Yes**			**Yes**	
12 hr available	65,232	898	66,130	3,884	18,021	38,616	60,521	7,800	54,100	6,400	68,300	229
12 hr required			54,000			18,000	36,000				30,000	
meets standard			**Yes**			**Yes**	**Yes**				**Yes**	
24 hr available	95,470	898	96,368	3,884	18,021	38,616	60,521	7,800	54,100	6,400	68,300	230
24 hr required			96,000				48,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	
48 hr available	95,470	898	96,368	3,884	19,461	38,616	61,961	7,975	54,100	6,400	68,475	233
48 hr required			96,000				60,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	

Plan Holder: National Response Corporation Oil Spill Contingency Plan (NRC)

Planning Standard Summary Analysis: WAC 173-182-370 San Juan County Planning Standard

The summary analysis spreadsheet is based on a conceptual model of equipment that would be available based on the guidelines set forth in WAC 173-182 for; planning standards, determining effectiveness of recovery systems, documenting compliance with planning standards, and plan evaluation criteria. Actual times and performance in spills will depend on the conditions of the day. An electronic version of the equipment detail spreadsheet which lists all equipment can be made available by Ecololgy upon request.The planning standard summary analysis indicates total access to boom, storage and recovery resources required to meet the planning standard. Equipment access is based on information listed on the WRRL and information provided through the plan holder contingency plan and Primary Response Contractor applications as of 9/28/2022**.** This information is subject to change as additional equipment is acquired and/or relocated. Substantive changes will result in an update of the spreadsheets.

PRC(s): NRC

Plan Holder owned equipment: YES, NRC equipment

Worst Case Spill Volume (bbls): 813,000

Oil Products Handled by Group (Group 1-5): 1-4

Mutual Aid/Letters Of Intent: Appendix B

Analysis point description: Planning Standard Area - Note all the resources to meet the 2 and 3 hour planning standards must be resident in the San Juan Islands Planning Standard Area. The plan to meet the 2 and 3 hour standards is detailed in the NRC PRC application.

Marine 50% or Freshwater 65% shore side storage credit (YES/NO?): No shoreside storage credit applied. NRC maintains letters of intent for barges of opportunity assets. Barge providers, capacities and LOIs can be viewed in Appendix B of the NRC contingency plan.

Alternative Planning Standard: N/A

	On-water Storage (bbls)	Shore side Storage (bbls)	Total Storage (bbls)	Calm Water (EDRC)	Protected Water (EDRC)	Open Water (EDRC)	Total Recovery (EDRC)	B1 Boom (ft)	B2 Boom (ft)	B3 Boom (ft)	Total Boom (ft)	Personnel (12 hour shift)
2 hr available	725	0	725	356	0	9,052	9,408	0	10,000	0	10,000	16
2 hr required			0				0				1,000	
meets standard			**Yes**				**Yes**				**Yes**	
3 hr available	725	0	725	356	0	9,052	9,408	0	11,000	0	11,000	21
3 hr required			0				0				3,000	
meets standard			**Yes**				**Yes**				**Yes**	
4 hr available	850	0	850	356	0	9,052	9,408	0	14,000	0	14,000	32
4 hr required			0				0				3,000	
meets standard			**Yes**				**Yes**				**Yes**	
6 hr available	32,146	148	32,294	356	0	15,088	15,444	0	18,700	2,000	20,700	63
6 hr required			12,500				12,500				13,000	
meets standard			**Yes**				**Yes**				**Yes**	
12 hr available	65,232	898	66,130	3,884	17,335	38,616	59,835	7,800	57,100	6,400	71,300	228
12 hr required			54,000				36,000				33,000	
meets standard			**Yes**				**Yes**				**Yes**	
24 hr available	95,470	898	96,368	3,884	17,335	38,616	59,835	7,800	57,100	6,400	71,300	229
24 hr required			96,000				48,000				53,000	
meets standard			**Yes**				**Yes**				**Yes**	
48 hr available	95,470	898	96,368	3,884	18,775	38,616	61,275	7,975	57,100	6,400	71,475	232
48 hr required			96,000				60,000				53,000	
meets standard			**Yes**				**Yes**				**Yes**	

Plan Holder: National Response Corporation Oil Spill Contingency Plan (NRC)

Planning Standard Summary Analysis: WAC 173-182-385 Nisqually Planning Standard

The summary analysis spreadsheet is based on a conceptual model of equipment that would be available based on the guidelines set forth in WAC 173-182 for; planning standards, determining effectiveness of recovery systems, documenting compliance with planning standards, and plan evaluation criteria. Actual times and performance in spills will depend on the conditions of the day. An electronic version of the equipment detail spreadsheet which lists all equipment can be made available by Ecololgy upon request.The planning standard summary analysis indicates total access to boom, storage and recovery resources required to meet the planning standard. Equipment access is based on information listed on the WRRL and information provided through the plan holder contingency plan and Primary Response Contractor applications as of 9/28/2022. This information is subject to change as additional equipment is acquired and/or relocated. Substantive changes will result in an update of the spreadsheets.

PRC(s): NRC

Plan Holder owned equipment: YES, NRC equipment

Worst Case Spill Volume (bbls): 23,409

Oil Products Handled by Group (Group 1-5): 1-4

Mutual Aid/Letters Of Intent: Appendix B

Analysis point description: Planning Standard Area

Marine 50% or Freshwater 65% shore side storage credit (YES/NO?): No shoreside storage credit applied. NRC maintains letters of intent for barges of opportunity assets. Barge providers, capacities and LOIs can be viewed in Appendix B of the NRC contingency plan.

Alternative Planning Standard: N/A

	On-water Storage (bbls)	Shore side Storage (bbls)	Total Storage (bbls)	Calm Water (EDRC)	Protected Water (EDRC)	Open Water (EDRC)	Total Recovery (EDRC)	B1 Boom (ft)	B2 Boom (ft)	B3 Boom (ft)	Total Boom (ft)	Personnel (12 hour shift)
2 hr available	25	0	25	0	0	0	0	0	1,000	0	1,000	3
2 hr required			0				0				1,000	
meets standard			**Yes**				**Yes**				**Yes**	
3 hr available	125	140	265	0	0	0	0	0	2,200	1,000	3,200	21
3 hr required			0				0				3,000	
meets standard			**Yes**				**Yes**				**Yes**	
6 hr available	690	390	1,080	1,178	12,691	11,501	25,370	0	28,600	4,400	33,000	116
6 hr required			702	351			702		2,400		15,000	
meets standard			**Yes**	**Yes**			**Yes**		**Yes**		**Yes**	
12 hr available	3,829	898	4,727	3,884	17,335	26,589	47,808	7,500	53,900	6,400	67,800	217
12 hr required			3,511	1,170			2,341		3,400		35,000	
meets standard			**Yes**	**Yes**			**Yes**		**Yes**		**Yes**	
24 hr available	35,232	898	36,130	3,884	17,335	29,016	50,235	7,800	54,100	6,400	68,300	227
24 hr required			6,555				3,277				55,000	
meets standard			**Yes**				**Yes**				**Yes**	
48 hr available	35,470	898	36,368	3,884	18,775	29,016	51,675	7,975	54,100	6,400	68,475	231
48 hr required			6,555				5,852				55,000	
meets standard			**Yes**				**Yes**				**Yes**	

Plan Holder: National Response Corporation Oil Spill Contingency Plan (NRC)

Planning Standard Summary Analysis: WAC 173-182-380 Commencement Bay Quartermaster Harbor Standard

The summary analysis spreadsheet is based on a conceptual model of equipment that would be available based on the guidelines set forth in WAC 173-182 for; planning standards, determining effectiveness of recovery systems, documenting compliance with planning standards, and plan evaluation criteria. Actual times and performance in spills will depend on the conditions of the day. The planning standard summary analysis indicates total access to boom, storage and recovery resources required to meet the planning standard. Equipment access is based on information listed on the WRRL and information provided through the plan holder contingency plan and Primary Response Contractor applications as of 9/28/2022**.** This information is subject to change as additional equipment is acquired and/or relocated. Substantive changes will result in an update of the spreadsheet.

PRC(s): NRC

Plan Holder owned equipment: Yes, NRC equipment

Worst Case Spill Volume (bbls): 813,000

Oil Products Handled by Group (Group 1-5): Group 1 through Group 5, lightest products are condensates, heaviest products are crude oils and bunker/residual fuel oils

Mutual Aid/Letters Of Intent: Appendix B

Analysis point description: Quartermaster Harbor Planning Standard Area

Marine 50% or Freshwater 65% shore side storage credit (YES/NO?): No shoreside storage credit applied. NRC maintains letters of intent for barges of opportunity assets. Barge providers, capacities and LOIs can be viewed in Appendix B of the NRC contingency plan.

Alternative Planning Standard:N/A

	On-water Storage (bbls)	Shore side Storage (bbls)	Total Storage (bbls)	Calm Water (EDRC)	Protected Water (EDRC)	Open Water (EDRC)	Total Recovery (EDRC)	B1 Boom (ft)	B2 Boom (ft)	B3 Boom (ft)	Total Boom (ft)	Personnel (12 hour shift)
1.5 hr available	0	0	0	0	0	0	0	0	1,000	0	1,000	1
1.5 hr required			0				0				1,000	
meets standard			**Yes**				**Yes**				**Yes**	
2 hr available	125	140	265	0	0	0	0	0	2,200	1,000	3,200	21
2 hr required			0				0				3,000	
meets standard			**Yes**				**Yes**				**Yes**	
4 hr available	330	312	642	1,000	4,548	5,465	11,013	0	12,200	3,400	15,600	73
4 hr required			0				0				3,000	
meets standard			**Yes**				**Yes**				**Yes**	
6 hr available	51,115	528	51,643	1,840	9,103	18,668	29,611	0	33,100	4,400	37,500	136
6 hr required			12,500				12,500				13,000	
meets standard			**Yes**				**Yes**				**Yes**	
12 hr available	53,829	898	54,727	3,884	18,021	27,720	49,625	7,500	53,900	6,400	67,800	220
12 hr required			54,000				36,000				33,000	
meets standard			**Yes**				**Yes**				**Yes**	
24 hr available	97,232	898	98,130	4,546	18,021	39,747	62,314	7,800	54,100	6,400	68,300	231
24 hr required			96,000				48,000				53,000	
meets standard			**Yes**				**Yes**				**Yes**	
48 hr available	97,470	898	98,368	4,546	19,461	39,747	63,754	7,975	54,100	6,400	68,475	235
48 hr required			96,000				60,000				53,000	
meets standard			**Yes**				**Yes**				**Yes**	

Plan Holder: National Response Corporation Oil Spill Contingency Plan (NRC)

Planning Standard Summary Analysis: WAC 173-182-405 Grays Harbor Planning Standard

The summary analysis spreadsheet is based on a conceptual model of equipment that would be available based on the guidelines set forth in WAC 173-182 for; planning standards, determining effectiveness of recovery systems, documenting compliance with planning standards, and plan evaluation criteria. Actual times and performance in spills will depend on the conditions of the day. An electronic version of the equipment detail spreadsheet which lists all equipment can be made available by Ecololgy upon request.The planning standard summary analysis indicates total access to boom, storage and recovery resources required to meet the planning standard. Equipment access is based on information listed on the WRRL and information provided through the plan holder contingency plan and Primary Response Contractor applications as of 2/13/2022. This information is subject to change as additional equipment is acquired and/or relocated. Substantive changes will result in an update of the spreadsheets.

PRC(s): NRC

Plan Holder owned equipment: YES, NRC equipment

Worst Case Spill Volume (bbls): 285,000

Oil Products Handled by Group (Group 1-5): 1-4

Mutual Aid/Letters Of Intent: Appendix B

Analysis point description: Planning Standard Area

Marine 50% or Freshwater 65% shore side storage credit (YES/NO?): Yes 50% credit. NRC has a LOI with REG Renewable Fuels for access to their facility tanks for shoreside storage. One LOI barge with a capacity of 27,708bbls is needed at 12 hours to meet the on-water storage requirements.

Alternative Planning Standard: NRC equipment capability currently does not provide the necessary volume of on-water storage at 6 and 12 hour standard for a worst case spill volume for tank vessels. Currently there are tank and non-tank vessels that transit the Grays Harbor planning standard area. The alternative relies on shoreside storage from REG for all vessels as well as non-dedicated barges of opportunity at 12 hours to meet shoreside and on-water storage requirements.

	On-water Storage (bbls)	Shore side Storage (bbls)	Total Storage (bbls)	Calm Water (EDRC)	Protected Water (EDRC)	Open Water (EDRC)	Total Recovery (EDRC)	B1 Boom (ft)	B2 Boom (ft)	B3 Boom (ft)	Total Boom (ft)	Personnel (12 hour shift)
2 hr available	0	0	0	0	0	0	0	0	0	1,000	1,000	2
2 hr required			0				0				1,000	
meets standard			**Yes**				**Yes**				**Yes**	
3 hr available	238	0	238	0	0	0	0	0	4,500	1,000	5,500	4
3 hr required			0				0				3,000	
meets standard			**Yes**				**Yes**				**Yes**	
4 hr available	364	8	372	0	3,588	3,019	6,607	0	5,700	1,000	6,700	9
4 hr required			0				0				3,000	
meets standard			**Yes**				**Yes**				**Yes**	
6 hr available	494	218	712	48	8,321	3,019	11,388	4,500	15,000	2,000	21,500	46
6 hr required			4,275	2,138			8,550	2,000	3,000		9,000	
meets standard			**Alt.**	**Yes**			**Yes**	**Yes**	**Yes**		**Yes**	
12 hr available	38,841	898	39,739	2,866	18,775	19,964	41,605	7,975	43,200	6,400	57,575	191
12 hr required			21,375	7,125		14,250	28,500		4,000		29,000	
meets standard			**Yes**	**Yes**		**Yes**	**Yes**		**Yes**		**Yes**	
24 hr available	39,466	898	40,364	2,866	19,461	38,616	60,943	7,975	47,200	7,400	62,575	199
24 hr required			39,900				39,900				49,000	
meets standard			**Yes**				**Yes**				**Yes**	
48 hr available	70,249	898	71,147	2,866	19,461	38,616	60,943	7,975	47,200	7,400	62,575	200
48 hr required			39,900				60,000				49,000	
meets standard			**Yes**				**Yes**				**Yes**	

Plan Holder: NRC

Planning Standard Summary Analysis: WAC 173-182-355 Transfer Site Planning Standard

The summary analysis spreadsheet is based on a conceptual model of equipment that would be available based on the guidelines set forth in WAC 173-182 for; planning standards, determining effectiveness of recovery systems, documenting compliance with planning standards, and plan evaluation criteria. Actual times and performance in spills will depend on the conditions of the day. An electronic version of the equipment detail spreadsheet which lists all equipment can be made available by Ecololgy upon request.The planning standard summary analysis indicates total access to boom, storage and recovery resources required to meet the planning standard. Equipment access is based on information listed on the WRRL and information provided through the plan holder contingency plan and Primary Response Contractor applications as of 9/28/2022**.** This information is subject to change as additional equipment is acquired and/or relocated. Substantive changes will result in an update of the spreadsheets.

PRC(s): NRCNW

Plan Holder owned equipment: Yes, equipment listed on the WRRL

Worst Case Spill Volume (bbls): 813,000

Oil Products Handled by Group (Group 1-5): groups 1-5

Mutual Aid/Letters Of Intent: NRC maintains several LOIs with local barge operators. Non-dedicated barges were used to meet the on water planning standards requirements.

Analysis point description: Port Angeles facility dock

Marine 50% or Freshwater 65% shore side storage credit: N/A

Alternative Planning Standard: N/A

	On-water Storage (bbls)	Shore side Storage (bbls)	On-water Total Storage (bbls)	Calm Water (EDRC)	Protected Water (EDRC)	Open Water (EDRC)	Total Recovery (EDRC)	B1 Boom (ft)	B2 Boom (ft)	B3 Boom (ft)	Total Boom (ft)	Personnel (12 hour shift)
2 hr available	100	0	100	178	0	0	178	0	1,000	0	1,000	7
2 hr required			0				0				1,000	
meets standard			**Yes**				**Yes**				**Yes**	
4 hr available	31,083	140	31,083	356	686	3,017	4,059	0	8,200	1,000	9,200	45
4 hr required			196				0				200	
meets standard			**Yes**				**Yes**				**Yes**	
6 hr available	34,200	320	34,200	1,178	5,234	16,945	23,357	3,300	26,600	4,400	34,300	124
6 hr required			25,000				12,500				10,000	
meets standard			**Yes**				**Yes**				**Yes**	
12 hr available	75,453	898	75,453	3,222	17,335	29,016	49,573	7,800	54,100	6,400	68,300	224
12 hr required			72,000				36,000				30,000	
meets standard			**Yes**				**Yes**				**Yes**	
24 hr available	150,470	898	150,470	3,884	17,335	38,616	59,835	7,800	54,100	6,400	68,300	229
24 hr required			144,000				48,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	
48 hr available	150,470	898	150,470	3,884	18,775	38,616	61,275	7,975	54,100	6,400	68,475	232
48 hr required			144,000				60,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	

Plan Holder: NRC

Planning Standard Summary Analysis: WAC 173-182-355 Transfer Site Planning Standard

The summary analysis spreadsheet is based on a conceptual model of equipment that would be available based on the guidelines set forth in WAC 173-182 for; planning standards, determining effectiveness of recovery systems, documenting compliance with planning standards, and plan evaluation criteria. Actual times and performance in spills will depend on the conditions of the day. An electronic version of the equipment detail spreadsheet which lists all equipment can be made available by Ecology upon request.The planning standard summary analysis indicates total access to boom, storage and recovery resources required to meet the planning standard. Equipment access is based on information listed on the WRRL and information provided through the plan holder contingency plan and Primary Response Contractor applications as of 9/23/2022**.** This information is subject to change as additional equipment is acquired and/or relocated. Substantive changes will result in an update of the spreadsheets.

PRC(s): NRC

Plan Holder owned equipment: Yes, equipment listed on the WRRL

Worst Case Spill Volume (bbls): 813,000

Oil Products Handled by Group (Group 1-5): groups 1-5

Mutual Aid/Letters Of Intent: NRC maintains several LOIs with local barge operators. Non-dedicated barges were used to meet the on water planning standards requirements.

Analysis point description: Cherry Point refinery

Marine 50% or Freshwater 65% shore side storage credit: N/A

Alternative Planning Standard: N/A

	On-water Storage (bbls)	Shore side Storage (bbls)	On-water Total Storage (bbls)	Calm Water (EDRC)	Protected Water (EDRC)	Open Water (EDRC)	Total Recovery (EDRC)	B1 Boom (ft)	B2 Boom (ft)	B3 Boom (ft)	Total Boom (ft)	Personnel (12 hour shift)
2 hr available	625	0	625	0	0	9,052	9,052	0	6,000	0	6,000	8
2 hr required			0				0				1,000	
meets standard			**Yes**				**Yes**				**Yes**	
4 hr available	725	0	725	356	0	9,052	9,408	0	8,000	1,000	9,000	21
4 hr required			196				0				200	
meets standard			**Yes**				**Yes**				**Yes**	
6 hr available	41,288	148	41,288	356	0	15,088	15,444	0	20,600	4,400	25,000	66
6 hr required			25,000				12,500				10,000	
meets standard			**Yes**				**Yes**				**Yes**	
12 hr available	75,215	898	75,215	3,222	17,335	29,016	49,573	7,800	54,100	6,400	68,300	223
12 hr required			72,000				36,000				30,000	
meets standard			**Yes**				**Yes**				**Yes**	
24 hr available	145,470	898	145,470	3,884	17,335	38,616	59,835	7,800	54,100	6,400	68,300	229
24 hr required			144,000				48,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	
48 hr available	145,470	898	145,470	3,884	18,775	38,616	61,275	7,975	54,100	6,400	68,475	232
48 hr required			144,000				60,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	

Plan Holder: NRC

Planning Standard Summary Analysis: WAC 173-182-355 Transfer Site Planning Standard

The summary analysis spreadsheet is based on a conceptual model of equipment that would be available based on the guidelines set forth in WAC 173-182 for; planning standards, determining effectiveness of recovery systems, documenting compliance with planning standards, and plan evaluation criteria. Actual times and performance in spills will depend on the conditions of the day. An electronic version of the equipment detail spreadsheet which lists all equipment can be made available by Ecololgy upon request.The planning standard summary analysis indicates total access to boom, storage and recovery resources required to meet the planning standard. Equipment access is based on information listed on the WRRL and information provided through the plan holder contingency plan and Primary Response Contractor applications as of 9/27/2022**.** This information is subject to change as additional equipment is acquired and/or relocated. Substantive changes will result in an update of the spreadsheets.

PRC(s): NRCNW

Plan Holder owned equipment: Yes, equipment listed on the WRRL

Worst Case Spill Volume (bbls): 813,000

Oil Products Handled by Group (Group 1-5): groups 1-5

Mutual Aid/Letters Of Intent: NRC maintains several LOIs with local barge operators. Non-dedicated barges were used to meet the on water planning standards requirements.

Analysis point description: Ferndale refinery dock

Marine 50% or Freshwater 65% shore side storage credit: N/A

Alternative Planning Standard: N/A

	On-water Storage (bbls)	Shore side Storage (bbls)	On-water Total Storage (bbls)	Calm Water (EDRC)	Protected Water (EDRC)	Open Water (EDRC)	Total Recovery (EDRC)	B1 Boom (ft)	B2 Boom (ft)	B3 Boom (ft)	Total Boom (ft)	Personnel (12 hour shift)
2 hr available	625	0	625	0	0	9,052	9,052	0	6,000	0	6,000	8
2 hr required			0				0				1,000	
meets standard			**Yes**				**Yes**				**Yes**	
4 hr available	725	0	725	356	0	9,052	9,408	0	8,000	1,000	9,000	21
4 hr required			196				0				200	
meets standard			**Yes**				**Yes**				**Yes**	
6 hr available	41,288	148	41,288	356	0	15,088	15,444	0	20,600	3,400	24,000	63
6 hr required			25,000				12,500				10,000	
meets standard			**Yes**				**Yes**				**Yes**	
12 hr available	75,215	898	75,215	3,222	17,335	29,016	49,573	7,800	54,100	6,400	68,300	223
12 hr required			72,000				36,000				30,000	
meets standard			**Yes**				**Yes**				**Yes**	
24 hr available	145,470	898	145,470	3,884	17,335	38,616	59,835	7,800	54,100	6,400	68,300	229
24 hr required			144,000				48,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	
48 hr available	145,470	898	145,470	3,884	18,775	38,616	61,275	7,975	54,100	6,400	68,475	232
48 hr required			144,000				60,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	

Plan Holder: NRC

Planning Standard Summary Analysis: WAC 173-182-355 Transfer Site Planning Standard

The summary analysis spreadsheet is based on a conceptual model of equipment that would be available based on the guidelines set forth in WAC 173-182 for; planning standards, determining effectiveness of recovery systems, documenting compliance with planning standards, and plan evaluation criteria. Actual times and performance in spills will depend on the conditions of the day. An electronic version of the equipment detail spreadsheet which lists all equipment can be made available by Ecololgy upon request.The planning standard summary analysis indicates total access to boom, storage and recovery resources required to meet the planning standard. Equipment access is based on information listed on the WRRL and information provided through the plan holder contingency plan and Primary Response Contractor applications as of 2/22/2021**.** This information is subject to change as additional equipment is acquired and/or relocated. Substantive changes will result in an update of the spreadsheets.

PRC(s): NRC

Plan Holder owned equipment: Yes, equipment listed on the WRRL

Worst Case Spill Volume (bbls): 813,000

Oil Products Handled by Group (Group 1-5): groups 1-5

Mutual Aid/Letters Of Intent: NRC maintains several LOIs with local barge operators. Non-dedicated barges were used to meet the on water planning standards requirements.

Analysis point description: March Point refineries

Marine 50% or Freshwater 65% shore side storage credit: N/A

Alternative Planning Standard: N/A

	On-water Storage (bbls)	Shore side Storage (bbls)	On-water Total Storage (bbls)	Calm Water (EDRC)	Protected Water (EDRC)	Open Water (EDRC)	Total Recovery (EDRC)	B1 Boom (ft)	B2 Boom (ft)	B3 Boom (ft)	Total Boom (ft)	Personnel (12 hour shift)
2 hr available	0	0	0	178	0	0	178	0	2,000	0	2,000	8
2 hr required			0				0				1,000	
meets standard			**Yes**				**Yes**				**Yes**	
4 hr available	1,263	148	1,263	356	0	15,088	15,444	0	13,700	1,000	14,700	50
4 hr required			196				0				200	
meets standard			**Yes**				**Yes**				**Yes**	
6 hr available	31,518	320	31,518	1,178	4,370	23,570	29,118	0	24,400	4,400	28,800	107
6 hr required			25,000				12,500				10,000	
meets standard			**Yes**				**Yes**				**Yes**	
12 hr available	105,232	898	105,232	3,884	17,335	29,016	50,235	7,800	54,100	6,400	68,300	225
12 hr required			72,000				36,000				30,000	
meets standard			**Yes**				**Yes**				**Yes**	
24 hr available	145,470	898	145,470	3,884	17,335	38,616	59,835	7,800	54,100	6,400	68,300	229
24 hr required			144,000				48,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	
48 hr available	145,470	898	145,470	3,884	18,775	38,616	61,275	7,975	54,100	6,400	68,475	232
48 hr required			144,000				60,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	

Plan Holder: NRC

Planning Standard Summary Analysis: WAC 173-182-355 Transfer Site Planning Standard

The summary analysis spreadsheet is based on a conceptual model of equipment that would be available based on the guidelines set forth in WAC 173-182 for; planning standards, determining effectiveness of recovery systems, documenting compliance with planning standards, and plan evaluation criteria. Actual times and performance in spills will depend on the conditions of the day. An electronic version of the equipment detail spreadsheet which lists all equipment can be made available by Ecololgy upon request.The planning standard summary analysis indicates total access to boom, storage and recovery resources required to meet the planning standard. Equipment access is based on information listed on the WRRL and information provided through the plan holder contingency plan and Primary Response Contractor applications as of 9/28/2022**.** This information is subject to change as additional equipment is acquired and/or relocated. Substantive changes will result in an update of the spreadsheets.

PRC(s): NRCNW

Plan Holder owned equipment: Yes, equipment listed on the WRRL

Worst Case Spill Volume (bbls): 813,000

Oil Products Handled by Group (Group 1-5): groups 1-5

Mutual Aid/Letters Of Intent: NRC maintains several LOIs with local barge operators. Non-dedicated barges were used to meet the on water planning standards requirements.

Analysis point description: Richamond Beach facility dock

Marine 50% or Freshwater 65% shore side storage credit: N/A

Alternative Planning Standard: N/A

	On-water Storage (bbls)	Shore side Storage (bbls)	On-water Total Storage (bbls)	Calm Water (EDRC)	Protected Water (EDRC)	Open Water (EDRC)	Total Recovery (EDRC)	B1 Boom (ft)	B2 Boom (ft)	B3 Boom (ft)	Total Boom (ft)	Personnel (12 hour shift)
2 hr available	117	140	117	840	0	0	840	0	2,200	1,000	3,200	23
2 hr required			0				0				1,000	
meets standard			**Yes**				**Yes**				**Yes**	
4 hr available	372	312	372	1,840	3,684	5,465	10,989	0	12,200	3,400	15,600	78
4 hr required			196				0				200	
meets standard			**Yes**				**Yes**				**Yes**	
6 hr available	40,985	320	40,985	1,840	5,234	14,518	21,592	0	24,400	4,400	28,800	116
6 hr required			25,000				12,500				10,000	
meets standard			**Yes**				**Yes**				**Yes**	
12 hr available	75,232	898	75,232	3,884	17,335	29,016	50,235	7,800	54,100	6,400	68,300	227
12 hr required			72,000				36,000				30,000	
meets standard			**Yes**				**Yes**				**Yes**	
24 hr available	145,470	898	145,470	3,884	17,335	38,616	59,835	7,800	54,100	6,400	68,300	229
24 hr required			144,000				48,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	
48 hr available	145,470	898	145,470	3,884	18,775	38,616	61,275	7,975	54,100	6,400	68,475	232
48 hr required			144,000				60,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	

Plan Holder: NRC

Planning Standard Summary Analysis: WAC 173-182-355 Transfer Site Planning Standard

The summary analysis spreadsheet is based on a conceptual model of equipment that would be available based on the guidelines set forth in WAC 173-182 for; planning standards, determining effectiveness of recovery systems, documenting compliance with planning standards, and plan evaluation criteria. Actual times and performance in spills will depend on the conditions of the day. An electronic version of the equipment detail spreadsheet which lists all equipment can be made available by Ecololgy upon request.The planning standard summary analysis indicates total access to boom, storage and recovery resources required to meet the planning standard. Equipment access is based on information listed on the WRRL and information provided through the plan holder contingency plan and Primary Response Contractor applications as of 9/23/2022**.** This information is subject to change as additional equipment is acquired and/or relocated. Substantive changes will result in an update of the spreadsheets.

PRC(s): NRCNW

Plan Holder owned equipment: Yes, equipment listed on the WRRL

Worst Case Spill Volume (bbls): 813,000

Oil Products Handled by Group (Group 1-5): groups 1-5

Mutual Aid/Letters Of Intent: NRC maintains several LOIs with local barge operators. Non-dedicated barges were used to meet the on water planning standards requirements.

Analysis point description: Harbor Island facilities docks

Marine 50% or Freshwater 65% shore side storage credit: N/A

Alternative Planning Standard: N/A

	On-water Storage (bbls)	Shore side Storage (bbls)	On-water Total Storage (bbls)	Calm Water (EDRC)	Protected Water (EDRC)	Open Water (EDRC)	Total Recovery (EDRC)	B1 Boom (ft)	B2 Boom (ft)	B3 Boom (ft)	Total Boom (ft)	Personnel (12 hour shift)
2 hr available	142	140	142	662	0	0	662	0	2,200	1,000	3,200	25
2 hr required			0				0				1,000	
meets standard			**Yes**				**Yes**				**Yes**	
4 hr available	685	312	685	1,840	4,548	5,465	11,853	0	12,300	3,400	15,700	86
4 hr required			196				0				200	
meets standard			**Yes**				**Yes**				**Yes**	
6 hr available	26,323	398	26,323	1,840	5,515	17,537	24,892	0	34,200	4,400	38,600	131
6 hr required			25,000				12,500				10,000	
meets standard			**Yes**				**Yes**				**Yes**	
12 hr available	113,067	898	113,067	3,884	17,335	26,589	47,808	7,500	54,000	6,400	67,900	219
12 hr required			72,000				36,000				30,000	
meets standard			**Yes**				**Yes**				**Yes**	
24 hr available	144,470	898	144,470	3,884	17,335	38,616	59,835	7,800	54,200	6,400	68,400	229
24 hr required			144,000				48,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	
48 hr available	144,708	898	144,708	3,884	18,775	38,616	61,275	7,975	54,200	6,400	68,575	233
48 hr required			144,000				60,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	

Plan Holder: NRC

Planning Standard Summary Analysis: WAC 173-182-355 Transfer Site Planning Standard

The summary analysis spreadsheet is based on a conceptual model of equipment that would be available based on the guidelines set forth in WAC 173-182 for; planning standards, determining effectiveness of recovery systems, documenting compliance with planning standards, and plan evaluation criteria. Actual times and performance in spills will depend on the conditions of the day. An electronic version of the equipment detail spreadsheet which lists all equipment can be made available by Ecololgy upon request.The planning standard summary analysis indicates total access to boom, storage and recovery resources required to meet the planning standard. Equipment access is based on information listed on the WRRL and information provided through the plan holder contingency plan and Primary Response Contractor applications as of 9/28/2022**.** This information is subject to change as additional equipment is acquired and/or relocated. Substantive changes will result in an update of the spreadsheets.

PRC(s): NRCNW

Plan Holder owned equipment: Yes, equipment listed on the WRRL

Worst Case Spill Volume (bbls): 813,000

Oil Products Handled by Group (Group 1-5): groups 1-5

Mutual Aid/Letters Of Intent: NRC maintains several LOIs with local barge operators. Non-dedicated barges were used to meet the on

Analysis point description: Tacoma area facilities

Marine 50% or Freshwater 65% shore side storage credit: N/A

Alternative Planning Standard: N/A

	On-water Storage (bbls)	Shore side Storage (bbls)	On-water Total Storage (bbls)	Calm Water (EDRC)	Protected Water (EDRC)	Open Water (EDRC)	Total Recovery (EDRC)	B1 Boom (ft)	B2 Boom (ft)	B3 Boom (ft)	Total Boom (ft)	Personnel (12 hour shift)
2 hr available	125	140	125	0	0	0	0	0	2,200	1,000	3,200	21
2 hr required			0				0				1,000	
meets standard			**Yes**				**Yes**				**Yes**	
4 hr available	330	312	330	1,000	4,548	5,465	11,013	0	12,200	3,400	15,600	73
4 hr required			196				0				200	
meets standard			**Yes**				**Yes**				**Yes**	
6 hr available	41,015	528	41,015	1,840	8,417	14,520	24,777	0	31,100	4,400	35,500	126
6 hr required			25,000				12,500				10,000	
meets standard			**Yes**				**Yes**				**Yes**	
12 hr available	83,829	898	83,829	3,884	17,335	26,589	47,808	7,500	53,900	6,400	67,800	218
12 hr required			72,000				36,000				30,000	
meets standard			**Yes**				**Yes**				**Yes**	
24 hr available	155,232	898	155,232	3,884	17,335	38,616	59,835	7,800	54,100	6,400	68,300	228
24 hr required			144,000				48,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	
48 hr available	155,470	898	155,470	3,884	18,775	38,616	61,275	7,975	54,100	6,400	68,475	232
48 hr required			144,000				60,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	

Plan Holder: NRC

Planning Standard Summary Analysis: WAC 173-182-355 Transfer Site Planning Standard

The summary analysis spreadsheet is based on a conceptual model of equipment that would be available based on the guidelines set forth in WAC 173-182 for; planning standards, determining effectiveness of recovery systems, documenting compliance with planning standards, and plan evaluation criteria. Actual times and performance in spills will depend on the conditions of the day. An electronic version of the equipment detail spreadsheet which lists all equipment can be made available by Ecology upon request.The planning standard summary analysis indicates total access to boom, storage and recovery resources required to meet the planning standard. Equipment access is based on information listed on the WRRL and information provided through the plan holder contingency plan and Primary Response Contractor applications as of 9/27/2022**.** This information is subject to change as additional equipment is acquired and/or relocated. Substantive changes will result in an update of the spreadsheets.

PRC(s): NRCNW

Plan Holder owned equipment: Yes, equipment details on the WRRL

Worst Case Spill Volume (bbls): 285,000

Oil Products Handled by Group (Group 1-5): Group 1 and 3

Mutual Aid/Letters Of Intent: NRC maintains and LOI with REG allowing access to their facility shoreside storage tanks.

Analysis point description: REG facility dock

Marine 50% or Freshwater 65% shore side storage credit: YES. The REG plan describes how recovered oil can be transferred to shore side storage using portable pumps and one of three pipelines from the terminal to the tank farm. Preparation time to transfer recovered oil in to shore side storage would vary from 15 minutes to 6 hours, depending on storage tank contents at the time of release. Preparation includes gathering transfer equipment, deploying hoses, manipulating valves, and potentially draining down a low level tank to avoid comingling recovered material with facility oils. A barge of opportunity, available via the NRC PRC application, is applied at hour 24 to ensure adequate access to on-water storage to meet the planning standard.

Alternative Planning Standard: REG operates under an approved alternative planning standard for on-water storage (WAC 173-182-620). Under the approved alternative REG provides advanced notification of arriving tank vessels to Ecology and its contractors, tug escorts for all inbound and outbound tank vessels calling at the facility, and response equipment is staged at the terminal during oil transfers with response personnel on standby. This includes NRCES staging 2 mini barges at the facility during all transfers for quick deployment in the event of a spill.

	On-water Storage (bbls)	Shore side Storage (bbls)	On-water Total Storage (bbls)	Calm Water (EDRC)	Protected Water (EDRC)	Open Water (EDRC)	Total Recovery (EDRC)	B1 Boom (ft)	B2 Boom (ft)	B3 Boom (ft)	Total Boom (ft)	Personnel (12 hour shift)
2 hr available	238	0	238	0	0	0	0	0	100	1,000	1,100	3
2 hr required			0				0				1,000	
meets standard			**Yes**				**Yes**				**Yes**	
4 hr available	464	8	464	0	3,588	3,019	6,607	0	5,700	1,000	6,700	9
4 hr required			196				0				200	
meets standard			**Yes**				**Yes**				**Yes**	
6 hr available	624	218	842	48	11,909	3,019	14,976	4,500	15,000	2,000	21,500	47
6 hr required			12,500				12,500				10,000	
meets standard			**Alt**				**Yes**				**Yes**	
12 hr available	38,911	898	39,809	2,866	15,187	21,095	39,148	7,975	43,200	6,400	57,575	191
12 hr required			36,000				36,000				30,000	
meets standard			**Yes**				**Yes**				**Yes**	
24 hr available	79,566	898	79,566	2,866	18,775	39,747	61,388	7,975	47,200	7,400	62,575	199
24 hr required			72,000				48,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	
48 hr available	110,349	898	110,349	2,866	18,775	39,747	61,388	7,975	47,200	7,400	62,575	200
48 hr required			72,000				60,000				50,000	
meets standard			**Yes**				**Yes**				**Yes**	

B. LETTERS OF INTENT

This appendix contains copies of Letters of Intent (LOIs) and/or contract for barges of opportunity and WCMRC Reciprocity and Spill Management Team (SMT) resources available under the Plan. Other contracts and mutual aid agreements, including Focus Wildlife, are available for inspection upon request. Other vendor response resource information is submitted as part of NRC's PRC Application.

Contents

Barges of Opportunity Total and Average Capacity

Company	T/B Name	Capacity (bbls)
Vane Line Bunkering, LLC.	VLB 311	35,000
Vane Line Bunkering, LLC.	VLB 313	35,000
Vane Line Bunkering, LLC.	VLB 501	50,350
Vane Line Bunkering, LLC.	VLB 303	33,250
Vane Line Bunkering, LLC.	VLB 41	36,860
Vane Line Bunkering, LLC.	VLB 801	83,674
Vane Line Bunkering, LLC.	VLB 802	84,000
Centerline Marine	FDH 26-2	24,600
Centerline Marine	FDH 35-1	35,300
Centerline Marine	FDH 35-2	35,300
Centerline Marine	FDH 35-3	35,000
Centerline Marine	FDH 35-4	32,000
Centerline Marine	FDH 35-5	32,000
Centerline Marine	Dottie	50,000
Centerline Marine	Hannah 2801	28,664
Centerline Marine	HMS 2000	20,000
Centerline Marine	Lovel Briere	50,000
Centerline Marine	Olympic Spirit	80,360
Centerline Marine	Shauna Kay	41,000
Centerline Marine	Betsy Arntz	31,500
Centerline Marine	Dale Frank Jr.	50,000
Centerline Marine	65 Roses	83,500
Centerline Marine	Dugan Pearsall	38,500
Centerline Marine	Nathan Schmidt	31,500
Centerline Marine	Webb Moffett	50,000
Centerline Marine	Dr. Bonnie W. Ramsey	31,500
Island Tug & Barge	Island Trader	65,000
Island Tug & Barge	ITB Resolution	26,500
Kirby Corporation	Puget Sounder	26,000
Kirby Corporation	Leo	80,000
Kirby Corporation	Pacific	80,861
Kirby Corporation	Sasanoa	80,000
Kirby Corporation	Cascades	70,374
Kirby Corporation	Columbia	58,000
Kirby Corporation	Antares	84,000
Kirby Corporation	Capella	80,000
Kirby Corporation	Rigel	80,000
Sause Bros.	Drakes Bay	87,000
Sause Bros.	Deneb	84,000
Total Storage Capacity		**2,040,593**
Average Storage Capacity		**52,323**

SCHEDULE 5

Use of Client's Barges. The Client agrees that it shall make available to the Provider on a preferential basis such barge capacity as the Provider may request to store oil in connection with an oil spill response effort. A preferential basis means that the Client shall provide such barge or barges as meets the storage capacity requested by the Provider except where, throughout the period of time of the Provider's request, the Client's barges are laden, or under time charter to a third party, or at a location from which they would not be able to arrive at the location requested by the Provider within the time period specified taking into account tug availability.

The consideration for Client's agreement to make barges available on a preferential basis is the favorable membership fees reflected in Schedule 3.

In exchange, the Provider agrees to pay the Client at market rates for the use of such barge(s).

The Client agrees to furnish the Provider with information requested concerning the Client's barges and to advise the Provider of changes in this information during the period of this Contract.

If the unit is available and response times fit NRC's needs, unit shall be cleaned exterior and interior tanks to condition prior to NRC's use.

All assist tugs, port charges and dock charges related to mobilization or post incident cleaning are for the account of NRC.

Any damages sustained during use and not recoverable by insurance shall be for account of NRC.

Acknowledged by:

Name: Michael Rees'o
Postion: V. Pres.
For and on behalf of
NATIONAL RESPONSE CORPORATION

Accepted by:

5/13/02.

Name: RUSHI MANUJINA
Position: CONSULTANT
For and on behalf of VANE LINE BUNKERING, INC.

June 11, 2021

Stephanie Barton
Director, Emergency Response Programs
NRC Environmental Services

Via Email: stephanie.barton@usecology.com

Re: Letter of Intent, Temporary Storage

Centerline hereby confirms that it will make available upon request by NRC Environmental Services Inc. (NRC) on an "as available" basis, the use of barges listed on the following page for use as interim storage of oil and water collected during oil spill response recovery operations in Washington State waters. Prevailing tariff rates will apply to the use of the named equipment.

Sincerely,

Name Bowman Hervey
Title Dir. VRP

SCHEDULE 5

Addendum No. 1

Use of Client's Barges, The Client agrees that it shall make available to the Provider on a preferential basis such barge capacity as the Provider may request to store oil in connection with an oil spill response effort. A preferential basis means that the Client shall provide such barge or barges as meets the storage capacity requested by the Provider except where, throughout the period of time of the Provider's request, the Client's barges are laden, or under time charter to a third party, or at a location from which they would not be able to arrive at the location requested by the Provider within the time period specified taking into account tug availability.

The consideration for Client's agreement to make barges available on a preferential basis is the favorable membership fees reflected in Schedule 3.

In exchange, the Provider agrees to pay the Client at market rates for the use of such barge(s).

The Client agrees to furnish the Provider with information requested concerning the Client's barges and to advise the Provider of changes in this information during the period of this Contract.

If the unit is available and response times fit NRC's needs, unit shall be cleaned exterior and interior tanks to condition prior to NRC's use.

All Assist Tugs, Port charges and Dock charges related to moralization or post incident cleaning are for the account of NRC.

Any damages sustained during use and not recoverable by insurance shall be for account of NRC.

Acknowledged by:

Name: Deborah Wick
Position: Client Services Manager
For and on behalf of
NATIONAL RESPONSE CORPORATION

Accepted by:

Name: STEVEN W. POLLOCK
Position: MGR, BUSINESS DEVELOPMENT
For and on behalf of
ISLAND TUG AND BARGE LTD.

SCHEDULE 5

Use of Client's Barges. The Client agrees that it shall make available to the Provider on an as available basis such barge(s) as the Provider may from time to time request to store oil in connection witb an oil spill response effort undertaken by Provider. The determination with respect to the availability of a barge shall be in the sole discretion of the Client.

The consideration provided by the Provider to the Client in exchange for the Client's agreement to make barges available is: (i) the favorable membership fees reflected in Schedule 3 hereto, (ii) the Provider's agreement to pay the Client their then-current rates for the use of such barge(s) on a bareboat charter basis under the Client's standard bareboat charter, and (iii) the Provider's agreement herein to defend, indemnify and hold harmless, the Client, its subsidiaries and affiliated companies, and their respective employees, directors, officers, servants, agents, invitees, vessels, and insurers, from and against any and all claims, demands, liens, liabilities or causes of action of every kind and character, in favor of any person or party, for injury to, illness or death of any person; for damage to or loss of property, including the barge(s) provided hereunder; for wreck removal; for pollution damages, including but not limited to costs associated with spill response, removal, and remediation, and damages to the environment; for violation of any requirement of law or regulation, including but not limited to any requirement related to proper and lawful disposal of any material placed in or on the barge(s) provided hereunder; or for consequential damages of any type, including loss of use of any vessel or property, arising from or related to the use of the barge(s) provided hereunder by the Provider. The Provider expressly agrees that the foregoing indemnity obligation shall extend to claims, demands, liens, liabilities or causes of action in favor of third parties. **The Provider further expressly agrees that the foregoing indemnity obligation is without regard to any negligence, including sole negligence, fault or strict liability of Client, its subsidiaries and affiliated companies, or their respective employees, directors, officers, servants, agents, and invitees and without regard to any condition of unseaworthiness of the barge(s) provided hereunder.** The Client agrees to furnish the Provider with information reasonably requested from time to time by the Provider concerning the Client's barges and to advise the Provider of changes in this information.

The Provider shall redeliver the barge(s) provided hereunder to the Client at the end of the time period specified, at the port from which each was mobilized for the Provider's use hereunder, or at such other location as the parties may hereafter agree, in as good order and condition as when received, reasonable wear and tear excepted, with all exterior surfaces, equipment and piping and interior tanks cleaned at the Provider's expense to their condition prior to the Provider's use. Reasonable wear and tear shall not, however, include any breakage, structural damage, or class impairments. Upon redelivery, the Client shall cause the barge(s) provided hereunder to be surveyed by a surveyor of its choosing to determine the condition of the barge(s) provided hereunder. Such survey shall be at the Provider's expense; the Provider may have a representative in attendance at the survey. If, upon such survey, it should be found that the barge(s) provided hereunder are not in as good condition as when received by the Provider, reasonable wear and tear

excepted, the Client shall have the right to either require the Provider at its sole expense to put the barge(s) provided hereunder in good condition as aforesaid, or accomplish said work itself, charging the cost thereof to the Provider. The Provider shall, during any period required to accomplish said work, be liable to the Client for charter hire as stipulated herein.

All tugs, port charges and dock charges related to mobilization, demobilization or post incident cleaning of, or otherwise levied against, barge(s) provided by the Client hereunder are for the account of the Provider.

Acknowledged by:

Name: Michael Reese
Position: SVP
For and on behalf of
NATIONAL RESPONSE CORPORATION

Acknowledged by:

Name:
Position:
For and on behalf of
KIRBY CORPORATION

SCHEDULE 5

Use of Client's Barges

October 17, 2007

The Client agrees that it shall make available to the Provider on a preferential basis such barge capacity as the Provider may request to store oil in connection with an oil spill response effort. A preferential basis means that the Client shall provide such barge or barges as meets the storage capacity requested by the Provider except where, throughout the period of time of the Provider's request, the Client's barges are laden, or under time charter to a third party, or at a location from which they would not be able to arrive at the location requested by the Provider within the time period specified taking into account tug availability.

The consideration for Client's agreement to make barges available on a preferential basis is the favorable membership fees reflected in Schedule 3. In exchange, the Provider agrees to pay the Client at market rates for the use of such barge(s). The Client agrees to furnish the Provider with information requested concerning the Client's barges and to advise the Provider of changes in this information during the period of this Contract. If the unit is available and response times fit NRC's needs, unit shall be cleaned exterior and interior tanks to condition prior to NRC's use.

All assist tugs, port charges and dock charges related to mobilization or post incident cleaning are for the account of NRC. Any damages sustained during use and not recoverable by insurance shall be for account of NRC.

Acknowledged by:

Name: Mr. Michael Reese
Position: Vice President
For and on behalf of
NATIONAL RESPONSE CORPORATION

Accepted by:

Name: Mr. Richard Lauer
Position: Manager - Bulk Products
For and on behalf of
SAUSE BROS., INC.

1/14/2021

Tiffany Gallo
NRC Environmental Services Inc.
Marine Operations Manager-Seattle
9520 10th Avenue South, Suite 150
Seattle, WA 98108

Subject: Letter of Intent – Access to REG Grays Harbor's Storage Tanks

Dear Ms. Gallo

This letter is to serve notice that REG Grays Harbor agrees to make the shore side facility tanks available to NRC Environmental Services Inc. (NRC) during a spill response on an "as-available" basis, with terms and conditions to be mutually agreed upon prior to a NRC request for utilization. The REG Grays Harbor shoreside tanks potentially available could provide a total of 48,000 bbls capacity for recovered oil as needed, on a case by case basis.

Please do not hesitate to contact me if you need additional information

Sincerely

DocuSigned by:
36FF4BE2E865479...
Derek Winkel
VP, Manufacturing Operations
Renewable Energy Group

RENEWABLE ENERGY GROUP
416 S. Bell Ave., Ames, IA 50010 / +1 888 REG 8686 / regi.com

POLARIS
APPLIED SCIENCES, INC.

12 October 2022

Stephanie Barton
NRC Environmental Services Inc.
9520 10"' Ave. South, Ste. 150
Seattle, WA 98108

RE: Letter of Intent

This letter serves as a written agreement that Polaris Applied Sciences, Inc. will provide to NRC Environmental Services Inc. (NRC), on an "as-available" basis, spill management team (SMT) members for the Environmental Unit or any other position or specialty deemed appropriate for oil spill response within our expertise. Our contact key numbers (cell phones) are:

Elliott Taylor	206-660-5753
Greg Challenger	206-369-5686
Andy Graham	206-419-1745

NRC is authorized to cite Polaris staff as potential SMT members in their contingency plan.

Sincerely,

Elliott Taylor
Principal

★ 755 Winslow Way East . Suite 302. Bainbridge Island, WA 98110-2483, USA Tel. +1-206-842-5667

Genwest

P.O. Box 397, Edmonds, WA 98020-0397
Ph: 425-771-2700 Fax: 425-672-8471
www.genwest.com

October 25, 2022

Tiffany Gallo
Marine Operations
NRC Environmental Services Inc.
9520 10th Ave South, STE 150
Seattle, WA 98108

Ms. Gallo,

This Letter of Intent serves as written agreement that Genwest Systems, Inc. will provide, on an "as-available" basis, specific incident management team members as requested to support NRC Environmental Services Inc.

These persons will serve in Genwest labor categories appropriate to their expertise and the requested level of support and will be billed at our standard commercial rates

NRC Environmental Services Inc. is authorized to cite Genwest staff as potential incident management team members in their contingency plan.

Sincerely,

John A. Murphy, President
Genwest Systems Inc.

WCMRC
Western Canada Marine Response Corporation

July 15, 2013

Ms Stephanie Barton
Director, Emergency Response Programs
NRC
9520 10th Avenue S.
Suite 150
Seattle, WA 98108
USA

Dear Ms Barton;

Re: Reciprocity Agreement

This Letter of Intent (LOI) constitutes an understanding between Western Canada Marine Response Corporation (WCMRC) and NRC to enter into good faith discussions to potentially define and develop a Reciprocity Agreement between both parties, on the understanding that WCMRC currently has an arrangement in place with the Washington State Maritime Commission, and WCMRC currently has no intention of making any changes to this arrangement, at this time.

The following highlights some of the obligations of the parties, and is not intended to cover all the terms and conditions of a Reciprocity Agreement:

1.) The traffic lanes in the Juan de Fuca Strait facilitate the orderly passage of ships to and from destination in Canada and the United States.

2.) As they currently operate, the traffic lanes require that all inbound ships travel though U.S. waters to reach either a U.S. or Canadian destination, while all ships departing from either a U.S. or Canadian destination must travel through Canadian waters.

3.) These circumstances have led to a situation where all ships transiting through the Juan de Fuca Strait, regardless of whether they are bound for a U.S. or Canadian destination, must transit the waters of both counties, thereby triggering the requirement to comply with two sets of legislation, including the potential payment of two sets of fees.

4.) Currently there is no reciprocity agreement between the Canadian and U.S. governments to harmonize the legislation of both countries to permit ships transiting through the Juan de Fuca Strait and proposing to call on ports in either Canada or the U.S., but not both, to comply with both with the Canadian and Washington State law without the payment of double fees.

Head Office/South Coast: PO Box 82070, Burnaby, BC V5C 5P2 – 201 Kensington Avenue, Burnaby, BC V5B 4B2 - Phone: 604 294-6001 – Fax: 604 294-6003
Vancouver Island Office: 6476A Norcross Road, Duncan, BC V9L 5T3 – Phone: 250 746-9443 – Fax: 250 746-9447
North Coast Office: PO Box 369, 101 Drydock Road, Prince Rupert, BC V8J 3P9 – Phone: 250 624-5666 – Fax: 250 624-5166

24 Hour Emergency 604 294-9116
www.wcmrc.com

July 15, 2013
Ms Stephanie Barton

1.) As an interim measure, until the Canadian and U.S. governments have completed the reciprocity agreement currently under discussion, WCMRC and NRC wish to enter into discussions to develop an agreement.

2.) Currently there will be no payment of fees required by either party, however, this could change in the future depending upon the governments and/or a decision by either party's Board of Directors.

The terms set out above are intended to be an obligation only to negotiate the terms of a reciprocity agreement, and does not bind the parties to any of the terms above until a Reciprocity Agreement is entered into by the parties.

Yours very truly,

WESTERN CANADA MARINE RESPONSE CORPORATION

Kevin J. Gardner
President/General Manager

KJG:ll

Acknowledged and Agreed:

NRC

By: Stephanie Barton

Head Office/South Coast: PO Box 82070, Burnaby, BC V5C 5P2 – 201 Kensington Avenue, Burnaby, BC V5B 4B2 - Phone: 604 294-6001 – Fax: 604 294-6003
Vancouver Island Office: 6476A Norcross Road, Duncan, BC V9L 5T3 – Phone: 250 746-9443 – Fax: 250 746-9447
North Coast Office: PO Box 369, 101 Drydock Road, Prince Rupert, BC V8J 3P9 – Phone: 250 624-5666 – Fax: 250 624-5166

24 Hour Emergency 604 294-9116
www.wcmrc.com

C. FORMS

This appendix contains copies of key forms referenced in the NRC Plan. The forms are also provided on the NRC web site for easy access by Covered Vessels at http://www.nrcc.com.

Contents

ICS forms are used by spill management team during response and exercises. ICS forms are not duplicated here, but are available in Command Post kits and can be downloaded from the following web site:

https://www.fema.gov/incident-command-system-resources

Covered Vessel Data Sheet

Vessel Name: _____

Official or IMO Number: _____

Gross Registered Tons (GRT): _____

Flag (Port of Registry): _____

Client

Company Name:

_____

Mailing Address:

_____

_____

_____

Phone: _____

Fax: _____

Email: _____

☐ **Vessel Owner** ☐ **Operator** ☐ **Charterer**

P & I Club: _____

Qualified Individual

Company or Individual Name:

_____

Phone: _____

Fax: _____

Email: _____

Agent (if applicable):

Company or Individual Name:

_____

Phone: _____

Fax: _____

Email: _____

Vessel Type (check one)

☐ Tank Ship (carrying oil of any kind as cargo)
☐ Tank Ship (not carrying oil as cargo)
☐ Tank Barge carrying oil as cargo
☐ Gas Carrier
☐ Passenger Vessel
☐ Container Ship
☐ Ro/Ro
☐ Break Bulk Cargo Carrier
☐ Fishing Industry Vessel
☐ Ferry Vessel
☐ Tug Boat
☐ Other (describe): _____

Vessel Transits/Operates in (check all that apply)

☐ Strait of Juan de Fuca ☐ Canadian Ports
☐ North Puget Sound ☐ Central Puget Sound
☐ Grays Harbor ☐ Olympia

Vessel Fuel

Total Capacity (bbls): _____
Carrying Fuel as Cargo ☐ Yes ☐ No
Product (gas/diesel/bunker) and Name (list all):

_____

_____

_____

Vessel Bulk Cargo

Total Capacity (bbls): _____
Product (crude/refined/other) and Name (list all):

_____

_____

_____

_____

NRC Washington State Vessel Plan Notification Instructions
- Post Prominently –

OIL SPILL and VESSEL EMERGENCY NOTIFICATIONS

In the event of a spill or threatened spill in Washington State waters, including the Straits of Juan de Fuca, Puget Sound and Grays Harbor (but excluding the Columbia River*):

1 - NOTIFY VESSEL'S QUALIFIED INDIVIDUAL (QI) IMMEDIATELY - DO NOT DELAY OR RELAY THIS CALL

1-___ ___ ___-___ ___ ___-___ ___ ___ ___

The QI or vessel's owner, operator or demise charterer will notify the U.S. COAST GUARD NATIONAL RESPONSE CENTER at 1-800-424-8802 and WASHINGTON EMERGENCY MANAGEMENT DIVISION at 1-800-258-5990

2 - NOTIFY OIL SPILL PRIMARY RESPONSE CONTRACTOR (NRC) IMMEDIATELY AND DIRECTLY - DO NOT DELAY OR RELAY THIS CALL

(631) 224-9141 or 1-877-880-4672

**** for spills in the Columbia River System, notify MFSA at (503) 220-2055.***

3 - NRC/NRCES FIELD DOCUMENT

Refer to the NRC FIELD DOCUMENT for further guidance on initial actions.

CONTACTING ERTV - An Emergency Response Towing Vessel (ERTV) is stationed at Neah Bay available to be hired by vessels experiencing a vessel emergency while in the Strait of Juan de Fuca and off the western coast of Washington State from Cape Flattery Light south to Cape Disappointment Light.

For ERTV Call (206) 281-3810 or 1-800-562-2856

Use the Notification Flow Chart & Documentation Template to record notifications (next page).

Record of Notifications
Calls by Vessel & QI:

Government/External Notifications			
Contact	Phone Number(s)	Person Notified	Time, Date, & Case ID/Record #
Response Contractor/ WA Vessel Plan SMT (NRC)	(631) 224-9141 or 1-877-880-4672		
Vessel QI			
USCG National Response Center	1-800-424-8802 or (202) 267-2675		
WA Emergency Management Division	1-800-258-5990		

Additional Notifications:

Internal Notifications			
Person to Contact	Phone Number(s)	Person Notified	Time & Date

Response Contractors			
Contact	Phone Number(s)	Person Notified	Time & Date

Record of Notifications

Calls by Vessel & QI:

Government/External Notifications			
Contact	Phone Number(s)	Person Notified	Time, Date, & Case ID/Record #
Response Contractor/ WA Vessel Plan SMT (NRC)	(631) 224-9141 or 1-800-883-4672		
Vessel QI			
USCG National Response Center	1-800-424-8802 or (202) 267-2675		
WA Emergency Management Division	1-800-258-5990		

Additional Notifications:

Internal Notifications			
Person to Contact	Phone Number(s)	Person Notified	Time & Date

Response Contractors			
Contact	Phone Number(s)	Person Notified	Time & Date

Internal NRC Field Document

The following provides NRC internal guidelines for use during the initial emergency phase of response to a spill or threatened spill including:

- Summary of NRC Initial Procedures
- Internal Notifications List
- IC Checklist

Summary of NRC Initial Procedures

- Initial report from Covered Vessel received by NRC IOC
- NRC IOC immediately notifies the NRC Plan IC
    - Second call to Vessel QI for additional info and /or assistance
- The NRC Plan IC calls the NRC On-Call Supervisor for resources as needed
    - Second call to Vessel QI
        - confirm USCG and WEMD notifications made
        - review initial response actions
        - discuss next steps
- NRC On-Call Supervisor dispatches response resources per NRC Plan IC

NRC Internal Notifications

Internal Notifications (NRC / US Ecology)			
Person to Contact	Phone Number(s)	Resource Type	Time & Date
Erick Chatfield, Marine Operations *	907-505-8212	SMT-Ops/Plan Staff	
Jim Riedel, Director of Marine Operations *	206-550-0648	SMT- Ops Staff	
Jeff Edwards, Safety Manager	206-607-3000	SMT- Command Staff	
Ryan Dickson, Operations Manager	206-730-3993	SMT- Command Staff	
Dale Raymond, Operations Manager	503-849-3834	SMT- Command Staff	
Amy Janak, Accounting Manager	503-939-4287	SMT- Finance Staff	
Jason Potts, West Region ER Manager	206-423-1857	SMT-Ops Staff	
Response Contractors			
Contact	Phone Number(s)	Resource Type	Time & Date
Genwest	425-771-2700	SMT-Planning Staff	
San Juan Island On-Call Vessel	206-255-0127 360-298-1383	SJI Ops-Initial	
Capriccio Leasing	206-300-0179	Aerial Ops/Observation	

Connor Barnes – Valiant Technical	206-293-8167	UAS Ops	
SciFly	619-758-0504	Aerial Ops/Night/IR	
Polaris Applied Sciences	425-823-4841	SMT-Enviro	
Nexus NW (Suzanne Lagoni/Joan McCoy)	206-790-9784 206-473-2663	SMT-PIO	
Focus Wildlife	800-578-3048	WRSP-Wildlife	
Polaris Applied Sciences	425-823-4841	SMT-Enviro	
CTEH	866-869-2834	Air Monitoring	
Emergency Response Tug	206-281-3800	Neah Bay ER Tug	
Western Canada Marine Response Corporation	604-294-9116	Canada Reciprocal Ag.	
Crux Diving	206-949-1663	Dive/NFO Services	
Global Diving	206-623-0621	Dive/NFO Services	
FDS Marine International	503-250-1633	Dive/NFO Services	

*Notified for every incident. Additional notifications are based upon determination of need by UC/SMT.

NRC IC Checklist

IC Name_____
Spill/ Exercise Name _____Date _____

Note: depending on the spill response situations, these steps may not all be needed and may not be in the correct order for that response. Necessary actions and priorities are determined by the IC.

Check	***Checklist Item***
☐	• Receive call from NRC IOC with initial notification information. IOC to provide: IOC Initial Spill Report form filled out with available information Notes and Phone Numbers _____ _____ _____ _____ ** Note: If NRC IOC receives a spill response notification from a non-Covered Vessel, the NRC Plan will not be activated unless the vessel QI signs a Covered Vessel Agreement*
☐	Is the vessel within the NRC coverage area (the Columbia River system is not covered under this plan)?

☐	Is the vessel headed to/from a Canadian Port or currently in Canadian waters? If so, contact WCMRC at 604-294-9116
☐	*Check with RP to confirm that required notifications are complete.* *Notes* _____
☐	Contact the NRC On Duty Supervisor. Request site safety and environmental conditions information, including tides and currents.
☐	Begin any applicable ICS forms • 201 - (may delegate to Planning Section Chief). • 214 • Others as applicable
☐	Call the vessel/agent/reporting party/facility/port/local representative at scene for further information if necessary Notes _____ _____
☐	Check with RP to confirm that required notifications are complete. Notes _____ _____
☐	Commence assessment phase • Product spilled _____ • SDS available? _____ • Initial size estimate _____ • Sensitive areas _____ • Other observations, i.e. personnel emergencies, ferries, salvage _____ _____ _____
☐	Coordinate with Covered Vessel QI.
☐	Schedule overflight with NRC trained aerial observer.

☐	Consider alternate means of assessment, i.e. ferries, tugs, dispatch FRV, etc.
☐	If conditions and complexity warrant, establish ICP and callout SMT with location of ICP. Notify Sector Seattle and Ecology responder.
☐	Start preparation of ICS 201 (may use Genwest or other Planning Section Chief).
☐	Notify Deputy IC of ICP location and depart for ICP when conditions permit.
☐	Work with NRC on assessment and needs for additional equipment.
☐	Complete ICS 201, hold Incident Briefing at ICP with Unified Command, section chiefs and command staff. Determine need for joint press release.
☐	At conclusion of initial 201 Brief, announce the time and location for the Initial Unified Command Meeting.
☐	Section Chiefs make personnel assignments in their sections and give information to Planning; let UC know of any personnel shortages.
☐	Initial Unified Command Meeting. a. Assess Operational Implications from Initial Brief i. SAR necessary ii. Salvage concerns, salvage master iii. Fire Fighting iv. Navigation concerns, safety zone v. Population safety concerns, evacuations vi. Response operations in right direction b. Clarify roles of UC members c. Agree on basic organization d. Agree on media procedures e. Agree on Safety Procedures f. Considerations, concerns, and issues discussed i. Space and support adequate ii. Any technical specialists needed iii. ICP adequate iv. Staffing needs v. Decanting

	vi. Decontamination vii. Disposal viii. Pre-clean debris from potentially impacted shoreline ix. Demobilization
☐	Unified Command Objectives Meeting a. Adopt an Overall Strategy b. Develop Initial Objectives (Typical below add additional as necessary) i. Ensure safety of citizens and response personnel ii. Control the source of the spill iii. Manage coordinated response effort iv. Maximize Protection of environmentally sensitive areas v. Contain and recover spilled material vi. Recover and rehabilitate injured wildlife vii. Remove oil from impacted areas viii. Minimize economic impacts ix. Keep stakeholders and public informed of response activities.
☐	Command and General Staff Meeting a. Deliver Incident Objectives (ICS 202) for current operational period. b. IC Expectations - Let UC know of problems, shortages, recommendations. If actions not following objectives let UC know. c. Policy on outside information dissemination (refer to JIC), all releases through UC. d. Policy on ordering additional equipment. (IC approve all orders for cleanup resources of $10k or more. Approve all administrative items of $1000 or more, i.e. copy machines, fax machines, laptop computers or other incidental purchases). e. Safety Officer produce Site Safety Plan ASAP, know of any immediate concerns? f. Liaison-make sure local tribes notified, county commissioners, port representative informed, waterfront businesses affected notified. g. Legal Officer contact RP and inform them of their responsibilities to take over. Get ETA from them, notify UC if hints of non-responsible RP.
☐	Ensure Tactics Meeting is held if needed, a. Ops identifies current strategies, and tactics, resources b. Resource needs identified c. Alternate strategies discussed This meeting may be combined with the Planning Meeting during this initial phase of the response.

CHANGE OF INCIDENT COMMANDER

Responsible Party: _____

NRC Plan Covered Vessel: _____

Location of Incident: _____

Date of Incident: _____

Whereas the Responsible Party (RP) Covered Vessel is covered under the NRC Umbrella Vessel Plan, herein referred to as the NRC Plan; and

Whereas the RP has previously agreed by contract with NRC to the appointment of the current Incident Commander (IC), herein referred to as "Plan IC"; and

Whereas the Responsible Party now desires to replace the current IC with a new IC, herein referred to as "RP IC"; the undersigned parties acknowledge as follows:

1. The RP IC is now prepared to take over responsibility for the direction of the spill response, containment and cleanup in accordance with the NRC Plan.

2. At the time and date set forth below, the RP relieves the Plan IC of all further responsibility for organizing, managing or implementing the spill response or cleanup in accordance with the NRC Umbrella Vessel Plan.

3. At the time and date set forth below, the person designated below as the RP IC shall be the authorized representative of the RP in all matters related to the spill and associated containment and cleanup and, to obligate the resources necessary to carry out the cleanup activities.

4. The RP IC shall keep the Federal and State On-Scene Coordinators fully advised of the actions taken or to be taken and will cooperate fully with the Coordinators in implementing the provisions of the federal and state cleanup requirements and of the NRC Plan.

Change of Incident Commander Effective as of:

Date: _____ Time: _____

Responsible Party

Name: _____

Signature: _____

Plan Incident Commander

Name: _____

Signature: _____

NRC

Name: _____

Signature: _____

RP Incident Commander

Name: _____

Signature: _____

RESPONSIBLE PARTY'S SAMPLE CHECKLIST

Summarized below are some common issues that arise during an oil spill response. However, because every situation in unique, it is impossible to capture every detail for the RP's consideration. This checklist is provided as a potential ***tool***, or ***quick reference guide***, to assist the RP in identifying and addressing responsibilities and/or issues during an oil spill response to its Covered Vessel.

The RP should always consult with its insurance and legal advisors.

1. **NOTIFICATIONS**
   Ensure that all required legal and necessary notifications have been made, e.g. federal, state, insurance; customer; others.

2. **INCIDENT COMMAND SYSTEM (ICS) ORGANIZATION**
   Complete the INCIDENT ORGANIZATION CHART ICS 207-OS for your Response Management Personnel (Team), as appropriate. Ensure that key individuals are trained / qualified / available.

3. **COMMAND POST LOCATION**
   Satisfied? If not, where will you re-locate? Individual responsible for relocation?

4. **FINANCE / SPENDING AUTHORITY**
   Who has spending authority, and to what limit? Communications established with insurer(s)?

5. **CONTRACTS**
   Agreement with PRC is pre-signed. Any other contracts needed?

6. **CLAIMS**
   Has claims process been started?

7. **COST TRACKING**
   How are costs being tracked and monitored?

8. **DISPOSAL PLAN**
   Is any of the waste "hazardous" under federal or state law? Is segregation required? Ensure custody and documentation.

9. **MEDIA / PUBLIC INFORMATION**
   Team with and support Joint Information Center….
   Are there any "corporate" PR issues which need separate handling?

10. **SITE SAFETY AND HEALTH PLAN (SSHP)**
    Include RP liaison with local public safety officials, as appropriate.

11. **SALVAGE**
    Issues? Preferred salvage master / contractor? Hull insurer notified?

12. **NATURAL RESOURCE DAMAGE ASSESSMENT (NRDA)**
    Issues? Consultant? Is a baseline assessment necessary or desirable?

13. **INCIDENT OBJECTIVES**
    Confirm / agree with Unified Command as appropriate

WESTERN CANADA MARINE RESPONSE CORPORATION
P.O. Box 82070, Burnaby, BC V5C 5P2
(Deliveries: 201 Kensington Avenue, Burnaby, BC V5B 4B2)
Emergency Contact No.: (604) 294-9116

Contract No.

SHIP (BULK OIL) MEMBERSHIP AGREEMENT
AND CONFIRMATION OF ARRANGEMENT
(UNDER SUBSECTION 167 (1) OF CANADA SHIPPING ACT, 2001)

_____
(Ship Owner)

_____

_____

_____
(Mailing Address)

_____
(Person Authorized to Implement Arrangement)

_____
(Address of Person Authorized to Implement Arrangement)

_____
(E-mail of Person Authorized to Implement Arrangement)

_____
(Telephone No. of Person Authorized to Implement Arrangement)

_____
(Facsimile No. of Person Authorized to Implement Arrangement)

This Agreement confirms that, effective upon the execution of this Agreement by both Western Canada Marine Response Corporation, ("Western Canada Marine Response") and Ship Owner/Operator/Authorized Agent, Ship Owner ("Owner") shall, in accordance with the terms of Subsection 167 (1) of the *Canada Shipping Act, 2001* as amended (the "Act"), have an arrangement with Western Canada Marine Response, a certified response organization with a 10,000 tonne rated capability.

Unless otherwise terminated for the reasons set forth in the attached terms and conditions, and provided all relevant fees have been paid, this Agreement shall in respect of the above-named ship commence on the Effective Date and continue in effect for one (1) year. There is no automatic renewal of this Agreement at the end of the one (1) year term.

Ship Name: _____

Official Number: _____

Effective Date: _____

End Date: _____

Term of Coverage: 1 year

WESTERN CANADA MARINE RESPONSE'S GAR

Geographic Area of Response

For purposes of this Agreement, Western Canada Marine Response's GAR means the Waters bordering the Province of British Columbia (including the shorelines associated with such Waters), the inland Waters of British Columbia, and excluding Waters north of the 60th parallel of latitude. GAR means the geographic area of response within which a response organization intends to offers its services.

Registration Fee (annual): $_____

Taxes (as applicable): $_____

TOTAL PAYABLE BY
EFFECTIVE DATE: $_____

All fees shall be due and payable on or before the Effective Date. The Registration Fee is payable annually. Bulk Oil Cargo Fees are also payable on the terms set forth in the attached terms and conditions. All fees shall be payable in Canadian dollars and shall be determined, and from time to time, amended, in accordance with the provisions of the Act.

ALL RESPONSIBILITY FOR PAYING FEES AND TAXES OWED UNDER THIS AGREEMENT SHALL REST WITH SHIP OWNER/OPERATOR/AUTHORIZED AGENT

THE TERMS AND CONDITIONS OF THIS ARRANGEMENT ARE SET FORTH BELOW AND CONSTITUTE AN INTEGRAL PART OF THE AGREEMENT BETWEEN WESTERN CANADA MARINE RESPONSE AND OWNER.

WESTERN CANADA MARINE RESPONSE CORPORATION

By: _____
(Authorized Signature)

_____
(Print Name)

_____
(Date)

_____
(Ship Owner/Operator/Authorized Agent)

By: _____
(Authorized Signature)

_____
(Print Name)

_____
(Date)

WESTERN CANADA MARINE RESPONSE CORPORATION
P.O. Box 82070, Burnaby, BC V5C 5P2
(Deliveries: 201 Kensington Avenue, Burnaby, BC V5B 4B2)
Emergency Contact No.: (604) 294-9116

Contract No.

SHIP (NON-BULK OIL) MEMBERSHIP AGREEMENT
AND CONFIRMATION OF ARRANGEMENT
(UNDER SUBSECTION 167 (1) OF CANADA SHIPPING ACT, 2001)

_____
(Ship Owner)

_____

_____

_____
(Mailing Address)

_____
(Person Authorized to Implement Arrangement)

_____
(Address of Person Authorized to Implement Arrangement)

_____
(E-mail of Person Authorized to Implement Arrangement)

_____
(Telephone No. of Person Authorized to Implement Arrangement)

_____
(Facsimile No. of Person Authorized to Implement Arrangement)

This Agreement confirms that, effective upon the execution of this Agreement by both Western Canada Marine Response Corporation, ("Western Canada Marine Response") and Ship Owner/Operator/Authorized Agent, Ship Owner ("Owner") shall, in accordance with the terms of Subsection 167 (1) of the *Canada Shipping Act, 2001* as amended (the "Act"), have an arrangement with Western Canada Marine Response, a certified response organization with a 10,000 tonne rated capability.

Unless otherwise terminated for the reasons set forth in the attached terms and conditions, and provided all relevant fees have been paid, this Agreement shall in respect of the above-named ship commence on the Effective Date and continue in effect for one (1) year. There is no automatic renewal of this Agreement at the end of the one (1) year term.

Ship Name: _____

Official Number: _____

Effective Date: _____

End Date: _____

Term of Coverage: 1 year

WESTERN CANADA MARINE RESPONSE'S GAR

Geographic Area of Response

For purposes of this Agreement, Western Canada Marine Response's GAR means the Waters bordering the Province of British Columbia (including the shorelines associated with such Waters), the inland Waters of British Columbia, and excluding Waters north of the 60th parallel of latitude. GAR means the geographic area of response within which a response organization intends to offer its services.

Registration Fee (annual): $_____

Taxes (as applicable): $_____

TOTAL: $_____

All fees shall be due and payable on or before the Effective Date. The Registration Fee is payable annually. All fees shall be payable in Canadian dollars and shall be determined, and from time to time, amended, in accordance with the provisions of the Act.

ALL RESPONSIBILITY FOR PAYING FEES AND TAXES OWED UNDER THIS AGREEMENT SHALL REST WITH SHIP OWNER/OPERATOR/AUTHORIZED AGENT

THE TERMS AND CONDITIONS OF THIS ARRANGEMENT ARE SET FORTH BELOW AND CONSTITUTE AN INTEGRAL PART OF THE AGREEMENT BETWEEN WESTERN CANADA MARINE RESPONSE AND OWNER.

WESTERN CANADA MARINE RESPONSE CORPORATION

By: _____
(Authorized Signature)

_____
(Print Name)

_____
(Date)

_____
(Ship Owner/Operator/Authorized Agent)

By: _____
(Authorized Signature)

_____
(Print Name)

_____
(Date)

SCHEDULE 2
(Section 167 (1)(b))

DECLARATION FOR A SHIP THAT IS IN WATERS SOUTH OF THE SIXTIETH PARALLEL OF NORTH LATITUDE

Pursuant to subparagraph 167(1)(b)(i) of the *Canada Shipping Act, 2001,* I declare that

(a) with respect to pollution insurance coverage, the ship's insurer is:

_____
(Name, address, phone number)

_____

(b) in accordance with paragraph 167(1)(a) of the *Canada Shipping Act, 2001*, I have an arrangement with the certified response organization known as:

WESTERN CANADA MARINE RESPONSE CORPORATION

_____
(Name, address, phone number)

(c) the arrangement is in respect of __ 10,000 ___ tonnes of oil and in respect of the following waters: _____
(waters in which the ship is operating)

(d) pursuant to subparagraph 167(1)(b)(iii) of the *Canada Shipping Act, 2001*

i. the following persons are authorized to implement the arrangement described in paragraph (b):

_____
(Name, telephone, fax and email)

_____
(Name, telephone, fax and email) (attach addition pages if required)

ii. the following persons are authorized to implement the shipboard oil pollution emergency plan required by section 27 of the Vessel Pollution & Dangerous Chemical Regulations, SOR/2012-69.

_____
(Name, telephone, fax and email)

_____
(Name, telephone, fax and email) (attach addition pages if required)

_____ _____
(Signed by Owner/Operator) (Date)

SCHEDULE "B"

SATISFACTORY EVIDENCE AS PROOF OF NON-RESIDENCE AND NON-REGISTRATION FOR GST/HST PURPOSES

I, _____,
(name and title of authorized individual)

of _____

_____

_____
(name and complete legal address of person, other than individual)

certify that _____
(name of person, other than individual)

is **not** resident in Canada for purposes of the *Excise Tax Act* and that

_____
(name of person, other than individual)

is **not** registered under the Act.

Where applicable, I agree to advise **The Shipping Federation of Canada** (as Agent for Western Canada Marine Response Corporation) Suite 326, 300 St. Sacrement Street, Montreal, Quebec H2Y 1X4, in the event there is any change to the residence status of

_____
(name of person, other than individual)

or should _____
(name of person, other than individual)

become registered for purposes of the *Excise Tax Act*.

_____ _____
Date Signature of Authorized Individual

_____
Title

Sample Claim Check List

Claim Number _____

Claimant's Name _____

Date Claim Received _____

Documents Provided		
1	Claim Form - Signed (Company X or Equivalent)	
2	Affidavit from employer on the impact on work or income due to the spill and if the company will be filing a claim for lost profits	
3	Analysis of spill substance	
4	Any expenses or money lost while the property was unavailable because of spill damage	
5	Beach closures or fishing advisories	
6	Booking records for three years prior to spill and year of spill	
7	Certification that rates used reflected actual costs incurred and did not include punitive damages or fees	
8	Copies of any job-hunting expenses (e.g., travel costs)	
9	Copies of any logs relating to boating activities for the year prior to and the year of the spill	
10	Copies of bills paid for repair of damage or two estimates showing activities and costs to repair the damage	
11	Copies of letters of business cancellations caused by the spill damage	
12	Copies of pay stubs and other documentation showing income Claimant received before, during, and after the spill and oil spill response	
13	Copies of pay stubs, etc., from alternative employment during time of spill	

Documents Provided		
14	Copies of pay stubs, receipts, etc., from before, during, and after the spill	
15	Copies of statutes, regulations, ordinances, etc., outlining applicable authority to raise such revenues, property affected, method of assessment, rate of assessment, and method and dates of collection of assessment	
16	Copy of title, deed, lease, or license to property in Claimant's name	
17	Daily records of equipment costs including description and use	
18	Daily records of personnel costs including details on labor rates, hours, travel, and transportation	
19	Daily reports on the activities of the government personnel and equipment involved	
20	Dates on which work was performed	
21	Describe any compensation available to Claimant for the subsistence loss Claimant suffered	
22	Describe each alternative source or means of subsistence available to Claimant during the period of time for which Claimant claim a loss of subsistence	
23	Describe each effort Claimant made to mitigate Claimant's subsistence use loss	
24	Describe how and to what extent Claimant's subsistence use of the natural resource was affected by the injury to, destruction of, or loss of, each specific natural resource	
25	Describe the actual subsistence use Claimant make of each specific natural resource Claimant identify	
26	Description and documentation of business losses due to spill	
27	Description of business losses caused by the spill	
28	Description of efforts to reduce Claimant's loss, including job search	
29	Description of what revenues were impacted and how the spill caused a loss of revenues	
30	Detailed description of actions	

Documents Provided		
31	Detailed description of what increased services were necessary and why, including a distinction between removal activities, safety acts, and law enforcement acts, and if the increase was actually incurred or if normal resources were diverted for use	
32	Details and explanation of net loss of revenue	
33	Details of any expenses not paid out by government during the period being claimed	
34	Details of employment expenses not paid during period being claimed (e.g., commuting costs)	
35	Details on efforts to mitigate losses or why no efforts were taken	
36	Details on expenses not paid out during period being claimed (e.g., wages)	
37	Evidence connecting the depressed selling price of a property to the oil spill rather than to other economic or real property factors	
38	Evidence that vessel(s) were in the area impacted by the spill and were unable to carry on their business due to the spill	
39	Explanation as to whether rates are fully loaded or not and formulas used; states should provide rates under OMB Circular A-87	
40	Financial statements for at least two years prior to spill and from the year of the spill	
41	For hotels, daily and monthly occupancy information for two years prior to spill and the year of the spill	
42	FOSC report	
43	FOSC, natural resource trustee and newspaper reports describing the oil spill and response, and the resulting injury, destruction or loss of natural resources	
44	Government financial reports showing total assessment or revenue collected for comparable periods, typically covering two years	
45	Government Labor and Equipment Rates	
46	How rates were determined and any comparison of rates	

Documents Provided		
47	Identify each specific natural resource for which compensation for loss of subsistence use is being claimed	
48	Information in EPA or USCG notifications, and claims advertising	
49	Information on EPA or USCG notification	
50	Lease or rental agreement of any substitute property used	
51	List of charter rates, including any services the business specializes in (e.g., sport fishing)	
52	Map of area	
53	Maps or descriptions of the area showing business location within spill area	
54	Maps or descriptions of the area showing the business location and the spill impact area	
55	Maps or legal documents showing the location of the property within the spill area	
56	Maps	
57	Newspaper reports describing the spill	
58	Payroll verification of hourly rate at the time of spill	
59	Payroll verification of the government hourly rate at the time	
60	Personnel records from Claimant's employer before, during, and after the spill, showing employment	
61	Photographs and videos	
62	Photos of damaged property (before and after the spill)	
63	Pictures of area, damage, and spill	
64	Pictures or videotape of property and/or damage	
65	Professional property appraisals for the value of the property prior to and after the spill	

Documents Provided		
66	Published accounts, witness statements and other written records documenting Claimant's use of natural resources for subsistence purposes before, during, and after the spill and oil spill response	
67	Receipts, invoices, or similar records with description of work	
68	Records showing compensation Claimant received for Claimant's loss	
69	Records showing the expenses Claimant avoided during the time Claimant were not able to carry out Claimant's subsistence use of the affected natural resource	
70	Registration documents for the vessel(s), copies of business license, vessel license, fishing license, captain's license	
71	Reports showing the increased public services were required and if the services were due to fire, health, or safety hazards	
72	Signed and dated records of the spill including hourly rates for labor and equipment	
73	Signed copies of income tax returns and schedules for at least three years prior to spill	
74	Signed copies of income tax returns and schedules for at least two years prior to spill	
75	Signed disposal manifests and proof of payment for disposal	
76	Statement from Claimant or witnesses on how the spill caused the loss of income; explain any earnings anomalies	
77	Statement from Claimant or witnesses on how the spill led to loss of income or earning capacity; explain any earnings anomalies	
78	Statement on how the spill caused a loss in income	
79	Store and barter receipts showing the replacement costs Claimant claim;	
80	Verification of standard equipment rates for equipment used	
81	Verification of the standard government equipment rates for any equipment claimed	

Documents Provided		
82	Witness statements and documents showing the alternative sources of subsistence available to Claimant, and Claimant's efforts to reduce the damages resulting from Claimant's loss of subsistence use, including receipts from job-hunting expenses (e.g., travel costs)	
83	Witness(es) statement(s)	
84	Other	
85	Other	
86	Other	

Sample Claim Form

1. Claimant Information:

Name:
POC:
Address:
Telephone:
Fax:
E-mail:

2. Provide Incident Details, if available:

Date & Time Injury or Damage Discovered:
Location of Injury or Damage:
Position (Lat/Long) of Injury or Damage:

3. Describe the injury or damage you are claiming:

4. Did you have any prior contact with Company X regarding your claim? With who?

(Enter Statement Here)

5. What is the type of claim you are submitting and what is the total monetary amount you are claiming in U.S. dollars? (Must be sum certain)

Claim Type: _____
Total Amount Claimed: **$**_____

6. Have you or your legal representative submitted the claim to an insurer or another responsible party before submitting this claim to CompanyX?
(Yes/No) – if "yes" provide date claim submitted to insurer or other RP and provide contact information

7. If the claim was submitted to an insurer of another responsible party, what response (written or verbal) or payment did you receive?
(i.e. Insurer or RP took no action, denied the claim, stated they had no money to pay the claim, made only a partial payment of $$$, or other – explain)

8. Have you commenced an action in court to recover costs which are the subject of this claim? (Yes/No) – if "yes" provide contact information for your attorney (name, address, telephone number), the court in which action is pending, and the civil action number

9. Describe the nature and extent of injuries or damages claimed, as supported by the documentation you are submitting with this claim:

10. Description of how the injury or damage was caused:

11. What actions did you take, if any, to minimize the injury or damages you claim:

12. Witnesses:
(Provide the name, address, telephone number, & email address) of anyone who witnessed the injury or damage you claim. Also provide a summary of each witness's knowledge of the injury or damage claimed, and/or the incident which caused the injury or damage.

Name:
Address:
Telephone Number:
Fax:
Email:
Summary:

Name:
Address:
Telephone Number:
Fax:
Email:
Summary:

13. List of Documents & Attachments:

14. Claimant's Signature & Date:

I, the undersigned, agree that upon acceptance of any compensation from Company X, I will cooperate fully in any claim or action by Company X to recover costs paid out in claims from any 3rd Party or entity that may also be responsible for the oil spill. This cooperation shall include, but is not limited to, immediately reimbursing to the Fund any compensation received from any other source for the same costs and/or damages and, providing any documentation, evidence, testimony, and other support, as may be necessary for the Fund to recover such compensation.

I, the undersigned, certify that, to the best of my knowledge and belief, the information contained in this claim represents all material facts and is true. I understand that misrepresentation of facts may result in legal action against me.

_____ **Date** _____

Signature of (Claimant)

15. Legal Representative's Signature & Date:

Is this claim being presented to Company X by your legal representative? If so, the legal representative must also sign this claim and provide contact information.

_____ **Date** _____

Signature of Legal Representative

Representative's Name: -
Address: -
Telephone Number: -
Fax: -
Email: -

Sample Advertisement for Claims

Oil Spill - Date
Product
Location

The U.S. Coast Guard National Pollution Funds Center has designated *Company* as the Responsible Party for an oil spill that occurred around *Time and Date*, impacting the waters of *location(s)*. An estimated *amount* gallons of heavy fuel oil was released from our vessel *name* on *location* into *location(s)*.

Company is receiving claims related to this incident. Information about claims and the claims process is available on-line at the *Company* website (see link below). You can also call, email, or mail us if you need additional assistance or information.

Website:

Email:

Phone:

Mail: Company – Oil Spill Claims
Address

Sample Required Claims Documentation

Claims for Property Damage

- Claimant must prove property damage was caused by the spill
- Claimant must prove that the amount claimed is appropriate
- Claimant must document that they owned or leased the property at the time of the spill
- Claimant must show that the property was injured or destroyed as the result of the spill
- Claimant must show that the value of the property both before and after the spill
- Claimant must show the cost to repair or replace the property
- Claimant must show they lost money by selling real property after the spill or prove the property's loss in value using verifiable property values before and after the spill
- The claim must be for a specific dollar amount
- The claim must be submitted within _____(months or years) of the spill
- Claimant must submit the claim in writing and sign it

Claims for Loss of Profits and Earning Capacity

- Claimant must prove that lost profits were caused by the spill
- Claimant must prove that the amount claimed is appropriate
- Claimant must document the property or natural resources that were damaged, destroyed, or lost, resulting in loss
- Claimant must show that income was reduced due to the damage or loss of the property or natural resources and show by how much it was reduced
- Claimant must show the amount of profits and earnings in similar time periods
- If alternative employment or business was available, Claimant must show what, if any, income they received from it
- Claimant must list savings to overhead and other normal expenses not paid as a result of the spill (e.g., commuting costs, utility fees)
- The claim must be for a specific dollar amount
- The claim must be submitted within _____(months or years) of the spill
- Claims must be submitted in writing and signed by Claimant(s)
- Additional documentation needed to support the claim includes:

    - Photographs
    - Tax returns for loss year and previous three years
    - Income Statements for loss year and previous three years
    - Balance Sheets for loss year and previous three years
    - Cash Flow Statements for loss year and previous three years
    - Receipts or other proof of revenue combined with proof of expenses
    - Reports from federal, state, tribal, or local response representatives including but not limited to the fire department, police, or other responder
    - Newspaper reports describing the spill
    - Any other documentation that Claimant feels supports the claim

Sample Claims Tracking Sheet

Claims Number _____

Claimant's Name _____

Claimant's Address _____

Claimant's Contact Phone# _____

Claimant's Email _____

Claim Type _____

Amount Claimed ($) _____

Date Claim Received _____

Name of Adjudicator (Lead) _____

Adjudicator Phone# _____

Adjudicator Email _____

Date Follow-Up Information Requested *(N/A if Not Applicable)* _____

Claim Determination Date (Sent) _____

Claim Determination Amount ($) _____

Date Release Received *(N/A if Not Applicable)* _____

Date Rejection Received *(N/A if Not Applicable)* _____

Date Payment Approved *(N/A if Not Applicable)* _____

Date Claim Closed _____

D. SPECIALIZED SERVICES

Contents

The services listed here are for reference in support of spill response operations.

NRC maintains additional lists of service providers.

For additional resource information, see the Northwest Area Plan, Annex 5000, at:

https://www.rrt10nwac.com/nwacp/

D.1 Aircraft Charters

NAME	TYPE	CONTACT
Kenmore Air Seattle, WA	Float plane	425-486-1257
NW Seaplanes Renton, WA	Float plane	425-277-1590
Classic Helicopters Seattle, WA	Helo	206-767-0515
Columbia Flyers Gig Harbor, WA	Helo with IR	253-686-1415

D.2 Aquaculture

In case of an oil spill, if possible, try to notify aquaculture activities in the vicinity. Preventative measures, such as booming, can prevent or minimize damage.

NAME/ADDRESS	CONTACT	TITLE	PHONE
Washington State Department of Natural Resources POB 47027 Olympia WA 98504	Celia Barton, Natural Resource Trustee	Aquaculture Program Coordinator	360-902-1735

D.3 Aquariums

Seattle Aquarium Pier 59, 1483 Alaskan Way Seattle, WA 98101	Dave Meiva, Operations Manager	Direct: 206-491-7095 General: 206-386-4359
Remarks: Promptly notify of any spills in area. They can shift to a closed system mode (water and air) for about 24 hours maximum. They have two salt water intakes located at the extreme west end of Pier 59. At lowest tide the intake depth is 40 feet. The biggest concern is gaseous vapor problems under the dock because of air intakes. Responsible party (spiller) is requested to boom off area to maintain water and air purity.		
Point Defiance Zoo and Aquarium 5400 North Pearl Street Tacoma, WA 98407	Scott Clark / Bill Ailiff Maintenance and Engineering Supervisor	253-591-5337
Remarks: They have a single salt water intake located on The Narrows (west) side of Point Defiance Park about 150 yards offshore. At lowest tide the intake depth is 10 feet. There is no secondary intake source and the flow must be maintained at all times. In an emergency they can shut down for a short period and make their own salt water.		

D.4 Incinerators

FUEL PROCESSORS, INC.
4150 N. Suttle Road
Portland, OR 97217
Bill Briggs – Owner
John Oxford – General Manager
1-800-367-8894

Remarks: Utilizes an energy recover process; burns everything. Meets all emission standards. Can handle anything (sorbents, plastics, rocks, sand, etc.) except **NO HAZARDOUS WASTE**. They will ONLY accept materials in open top containers (55 gallon drums); no bulk truck loads. They can burn up to 11 barrels per day; have limited storage capacity.
Note: Test results required.

RECOMP OF WASHINGTON, INC.
1524 Slater Road
Ferndale, WA 98248
Rick Lagerwey
360-384-1057

Remarks: Non-dangerous combustible solid waste, i.e. sorbents, rags, wood, etc.

SPOKANE, CITY OF:
Administrative Office:
808 W. Spokane Falls Blvd.
Spokane, WA 99201
Incinerator:
South 2900 Geiger Blvd.
Spokane, WA 99204
509-625-7878
Disposal Hotline: 509-477-6800

Remarks: State-of-the-art system. Opened in 1991.

OTHERS:
Cadence Chemical Resources, Inc.
P.O. Box 770
Michigan City, IN 46360
219-879-0371
FAX: 219-879-0390

Remarks: Operates facilities in Kansas, Nebraska and Arkansas. Cement kiln recycling process; can handle any hazardous waste stream. Full RCRA compliance.

D.5 Tribal Fisheries

The 32 Indian Tribes in NORTHWEST Washington State (Puget Sound and Olympic Peninsula) can also be reached through the BIA offices in Everett, WA: (425) 258-2651

TRIBE	LOCATION	TELEPHONE
SUQUAMISH	Suquamish, WA	360-598-3311
PUYALLUP	Tacoma, WA	253-680-5560
MUCKLESHOOT	Auburn, WA	253-939-3311
NISQUALLY	Olympia, WA	360-456-5221
SQUAXIN ISLAND	Shelton, WA	360-426-9781
SKOKOMISH	Shelton	360-426-4232
QUINALT	Taholah, WA	360-276-8211
HOH	Forks, WA	360-374-6582
QUILEUTE	La Push, WA	360-374-6163
MAKAH	Neah Bay, WA	360-645-2201
PORT GAMBLE S'KLALLAM	Kingston, WA	206-297-2646
S'KLALLAM	Sequim, WA	360-683-1109
LOWER ELWHA	Port Angeles, WA	360-452-8471
LUMMI	Bellingham, WA	360-734-8180
NOOKSACK	Deming, WA	360-592-5176
SWINOMISH	La Connor, WA	360-466-3163
UPPER SKAGIT	Sedro Woolley, WA	360-856-5501
SAUK SUIATTLE	Darrington, WA	206-435-8366
SAMISH	Anacortes, WA	360-293-6404
SHOALWATER BAY	Tokeland, WA	360-267-6766
STILLAGUAMISH	Arlington, WA	360-652-7362
TULALIP	Marysville, WA	360-651-4000

D.6 Response Support Contractors

ARROW LAUNCH SERVICE
Port Angeles, WA
360-457-1544

BAKER TANKS NW.
Woodinville, WA
425-487-6503

BALLARD DIVING & SALVAGE
Seattle, WA
206-784-5911

FRAC-TANKS, INC.
Brownsville, OR
541-466-5196

FRED DEVINE DIVING & SALVAGE
Portland, OR
503-283-5285

GLOBAL DIVING & SALVAGE
Seattle, WA
206-623-0621

RAIN-FOR-RENT RENTAL TANKS
Arlington, WA
360-403-3091

USN Supervisor of Salvage Directorate Naval Sea Systems Command
Operations & Ocean Engineering 703-602-7527, 703-607-2758

D.7 Technical Support

Scientific Support Coordinator (SSC)
National Oceanographic & Atmospheric Administration
7600 Sand Point Way N.E.
Seattle, WA 98115
24 hours 206-526-6317

Remarks: Spill trajectories; ESI maps; other roles described in National Contingency Plan [40 C.F.R. 300.34(d)].

Polaris Applied Sciences
755 Winslow Way East #302
Bainbridge Island, WA 98110
24 hours 206-954-9648

Remarks: Scientific support; NRDA; overflight assessment and mapping

Genwest
PO Box 397
Edmonds, WA 98020
24 hours 425-771-2700

Remarks: Spill management team support; Planning: Situations boards

D.8 Wildlife Rescue and Rehabilitation

Focus Wildlife
1408 19th St
Anacortes, WA 98221
Chris Battaglia
800-578-3048

Remarks: Provides wildlife rescue services, provides responders, specialist and responder training. The primary wildlife rescue personnel provider under the NRC Plan, to deploy in conjunction with the NRCES MRU equipment.

International Bird Rescue
San Francisco Oiled Wildlife Care and Education Center
4369 Cordelia Rd.
Fairfield, CA 94534
IBR Representative Pacific NW – Alaska
P.O. Box 5574
Lynnwood, WA 98046
Curt Clumpner
707-207-0380
FAX: 707-207-0395
503-338-7490

Remarks: This is a consulting firm having some equipment for bird cleanup, but basically providing information and supervisory assistance. The center has a slide program for rapid training of local volunteers.

Tri-State Bird Rescue
110 Possum Hollow Road
Newark, DE 19711
24/7 pager 800-710-0695
302-737-9543
Reception Desk 9am to 5 pm ET

Remarks: Tri-State has trained, dedicated staff on call 24/7 to respond to oil spills anywhere in the world.

Sarvey Wildlife Care Center
P.O. Box 3509
Arlington, WA 98223
Leslie Henry, Clinic Director
360-435-4817

Remarks: They can respond to effect bird rescue within Puget Sound Region. They have a limited full-time staff and equipment, but can provide training, organization, and supervision to local volunteers.

Wolf Hollow Wildlife Rehabilitation Centre
P.O. Box 391
Friday Harbor, WA 98250
Julie Knight, Executive Director
24 hours 360-378-5000

Remarks: This facility is authorized to handle endangered species. They provide a full range of rehabilitation services for birds, marine mammals and land mammals.

Oiled Wildlife Care Network
Wildlife Health Center
School of Veterinary Medicine
University of California, Davis
One Shields Ave.
Davis, CA 95616
503-752-4167

Remarks: The Oiled Wildlife Care Network (OWCN) is a statewide collective of trained wildlife care providers, regulatory agencies, academic institutions and wildlife organizations that works to rescue and rehabilitate oiled wildlife.

Progressive Animal Welfare Society (PAWS)
Wildlife Center
15305 44th Ave W
Lynnwood, WA 98087
425-787-2500, ext 815

Remarks: Can provide limited local wildlife animal care assistance in the event of a spill.

Washington Dept. of Fish and Wildlife: Oil Spill Response Team
24/7 pager 360-534-8233
Remarks: POC to report oiled wildlife. Provides conduit to personnel and equipment.

NOAA National Marine Fisheries Service: NW Regional Stranding Coordinator
Brent Norberg
206-526-6150

Remarks: POC to report stranded/oiled marine mammals.

Island Oil Spill Association (IOSA)
P.O. Box 2316
Friday Harbor, WA 98250
Paul Hamdorf
360-317-1347

Remarks: This organization may be able to provide oil spill assessment, cleanup containment services and wildlife rescue services.

Humane Society of the U.S. (HSUS)
National Headquarters:
2100 L St. NW
Washington, D.C. 20037
202-452-1100

Remarks: This organization can send staff to the scene of major spills and supports bird rescue efforts until local volunteers and agencies assume responsibility. HSUS can provide information to local animal assistance organizations which can help in the event of a spill.

D.9 *Work Vessels*

ELSIE M II (Uninspected landing craft, steel hull, and 5 passenger limit)
24 hour capability is variable and typically has a 1 man crew
56ft. Length x 14ft. Beam x 52in. Draft (Unloaded) and 60in. Draft(Loaded)
Cargo Deck is 40ft. x 11ft.
Ramp Width 14ft. and Ramp Length 12.5ft.(60,000lbs. Ramp Weight Allowance)
Cargo weight rating is 60,000lbs.
Conventional Shaft Drive-Twin Screw with an estimated cruising range of 400 nm.
No crane available
Geographic waters of vessel: Inland Waters

Contact
Hat Island Community Inc.
PMB 3616 335 Colby Ave
Everett, WA 98201
Phone (Office) 1-360-444-6611 (Home) 1-360-444-6657

HENRY ISLAND (USCG inspected landing craft, steel hull, and 6 passengers per COI)
24 hour capability is variable and typically crewed by 1 man
85ft.Length x 25.5ft.Beam x 3.2ft.Draft (Unloaded) and 4.5ft.(Loaded)
Cargo Deck is 70ft. x 23.5ft.
Ramp Width 15ft. and Ramp Length 15ft.(100,000lb. ramp Weight Allowance)
Cargo weight rating is 185,000lbs.
Conventional Shaft Drive-Twin Screw with an estimated cruising range of 800 nm.
No crane available
Geographic waters of vessel: Inland Waters

Contact
San Juan Ferry and Barge
P.O. Box 965
Friday Harbor 98520
Phone (24 Hour) 1-360-378-4404 (Cell Phone) 1-360-317-8486

ISLAND EXPRESS (USCG inspected landing craft, aluminum hull, 42 passengers per COI)
24 hour capability is variable and typically has 2 man crewing
40ft. Length x 14ft. Beam x 3.5ft Draft (Unloaded) and 4ft. (Loaded)
Cargo Deck is 10ft x 13ft.
Ramp Width 9.5ft.and Ramp Length 4ft.(2,000lbs. Ramp weight Allowance)
Cargo weight rating is 6,000lbs.
Out Drives-Twin Screw with an estimated cruising range of 250 nm.
No Crane
Geographic waters of vessel: Inland Waters

Contact
Island Express Charters Inc.
4005 Robin Ct.
Anacortes, WA 98221
Phone (24 hour) 1-360-229-2875
Email:islandexpresscharters.com

ISLAND TRANSPORTER (Uninspected landing craft, steel hull, and 6 passenger limit)
24 hour capability is variable and typically has a 1 man crew
74ft. Length x 25ft. Beam x 3ft. (Unloaded) and 4ft. (Loaded)
Cargo Deck is 66ft. x 22ft.
Ramp Width 12ft. and ramp Length 13ft. (100,00lbs. Ramp Weight Allowance)
Cargo weight rating is 100,000lbs
Conventional Shaft Drive-Twin Screw with an estimated cruising range of 200 nm.
1 ton crane (small)
Geographic waters of vessel: Near Coastal and Inland Waters

Contact
Island Transporter
1909 Skyline Way Suite 103
Anacortes, WA 98221
Phone (24 Hour) 1-360-293-6060 (Fax) 1-360-293-8674 (Cell) 1-360-941-6060

LITEWEIGHT (Uninspected landing craft, steel hull, and 6 passengers limit)
24 hour capability is variable and typically has a 2 man crew
74ft. Length x 22ft. Beam x 5.5ft. Draft (Unloaded) and 6ft. Draft(Loaded)
Cargo Deck is 42ft. x 14.5ft.
Ramp Width 14.5ft. and Ramp Length 18ft.(40 ton Ramp Weight Allowance)
Cargo weight rating is 40 tons
Conventional Shaft Drive-Twin Screw with an estimated cruising range of 1,500 nm.
12,000 lb certified crane(1,200 lb max at 31ft. max.) 35 ton Lorain mobile crane, and deck barge with ramp available
Geographic waters of vessel: Inland Waters and Near Coastal Waters

Contact
Liteweight Marine
5320 Orcas Road
Eastsound, WA 98245
Phone (Office) 1-360-376-2257
Email: liteweight@orcasonline.com

NORDLAND (USCG inspected landing craft, wooden hull, and 6 passengers per COI)
24 hour capability is variable and typically has a 1 man crew
65ft. Length x 22.5ft.Beam x 4.5ft.Draft (Unloaded) and 5.5ft.Draft (Loaded)
Cargo Deck is 52ft. x 21ft.
Ramp Width 13ft. and ramp Length 12ft. (75,000lb. ramp Weight Allowance)
Cargo weight rating is 75,000lb.
Conventional Shaft Drive-Single Screw with an estimated cruising range of 300nm.
No Crane
Geographic waters: Inland waters

Contact
San Juan Ferry and Barge
P.O. Box 965
Friday Harbor, WA 98520
Phone (24 Hour) 1-360-378-4404 and (Cell Phone) 1-360-317-8486

PINTAIL (USCG inspected landing craft, steel hull, and 6 passengers per COI)
24 hour capability is variable and typically has 1 to 2 man crewing
70ft. Length x 26ft. x Beam x 4ft. (Unloaded) and 5.2ft. Draft (Loaded)
Cargo deck is 48ft. x 26ft.
Ramp Width 17ft. and Ramp Length 22ft.(100,000lbs. Ramp Weight Allowance)
Cargo weight rating is 100,000lbs.
Conventional Shaft Drive-Twin Screw with an estimated cruising range of 3,200 nm
4 ton certified crane (onboard) and a 20 ton certified mobile crane available
Geographic waters of vessel: Near Coastal and Inland Waters

Contact
Pintail Inc.
P.O. Box 3284
Friday Harbor 98250
Phone (24 hour) 1-360-317-8532
Email:pintail@rockisland.com

SEA SPRAY (Uninspected landing craft, aluminum hull, and 6 passenger limit)
24 hour capability is variable and typically has a 3 to 4 man crewing
65ft. Length x 17ft. Beam x 2ft. Draft (Unloaded) and 3ft. Draft (Loaded)
Cargo Deck is 40ft. x 14ft.
Ramp Width 15ft. and Ramp Length 10ft.(50,000lbs Ramp Weight Allowance)
Cargo weight rating is 50,000lbs.
Out Drives-Twin Screw with an estimated cruising range of 600nm.
2 cranes rated at 1,500 lbs. at18ft. radius
Geographic waters of vessel: Near Coastal and Inland Waters

Contact
Trident Seafood (Matt Chester)
7226 182 St. SW
Edmonds, WA 98206
Phone (24 hour) 1-206-853-2390 or 1-425-697-5274

SPRIG II (Uninspected landing craft, steel hull, and 6 passenger limit)
24 hour capability is variable and typically has a 3 to 4 man crewing
75ft. Length x 21ft. Beam x 4ft. Draft (Unloaded) and 5.5ft Draft (Loaded)
Cargo Deck is 17ft. x 55ft.
Ramp Width 16ft. and Ramp Length 12ft.(120,000lbs Ramp Weight Allowance)
Cargo weight rating is 120,000lbs.
Conventional Shaft Drive-Twin Screw with an estimated cruising range of 1,200nm.
1,800 lb. crane at full extension
Geographic waters of vessel: Near Coastal and Inland Waters

Contact
Trident Seafood (Matt Chester)
7226 182 St. SW
Edmonds, WA 98206
Phone (24 hour) 1-206-853-2390 or 1-425-697-5274

THUNDERBIRD (Uninspected landing craft, steel hull, and 6 passenger limit)
24 hour capability is variable and typically has 3 man crewing
75ft. Length x 20ft. Beam x 4ft. Draft (Unloaded) and 7ft. Draft (Loaded)
Cargo Deck is 60ft. x 20ft.
Ramp Width is 10ft. and Ramp Length is 14ft.(50,000lb. Ramp Weight Allowance)
Cargo weight rating is 50,000lbs.
Conventional Shaft Drive-Twin Screw with an estimated cruising range of 1,500 nm
6 and 3 ton certified cranes
Geographic waters of vessel: Near Coastal and Inland Waters

Contact
Washington State Parks (Lynn Nordon)
160 Cornet Bay Road
Oak Harbor, WA 98277
Phone 1-360-902-8540, 1-360-902-8544 (Tim Payne), and (Cell) 1-360-789-3975

WARRIOR (USCG inspected landing craft, steel hull, and 6 passengers per COI)
24 hour capability is variable and typically has 2 man crewing
56ft. Length x 20ft.Beam x 2ft. Draft (Unloaded) and 2.6ft. Draft (Loaded)
Cargo Deck is 35ft.x 20ft.
Ramp Width 9ft. and Ramp Length 18ft.(40,000lb. Ramp Weight Allowance)

Cargo weight rating is 40,000lbs
Conventional Shaft Drive-Twin Screw with an estimated cruising range of 300 nm.
5 ton certified crane (4,000 lbs at 26ft. all radius)
Geographic waters vessel of vessel: Near Coastal and Inland Waters

Contact
Arrow Launch Service
P.O. Box 2376, 115 E. Railroad Ave
Port Angeles, WA 98362
Phone (24 Hour) 1-800-224-2949, 1-360-457-1544 and (Fax) 1-360-457-1552
Email:dispatch@arrowlaunch.com

E. Neah Bay Emergency Response Towing Vessel (ERTV)

Contents

The information below is provided for reference by NRC/NRCES Plan Covered Vessels, owners, agents and demise charterers, regarding the availability and potential use of the ERTV to support responses to vessel emergencies, including spills or threatened spills from Covered Vessels. Lists of other service providers are located in Appendix D. Additional information is also available in the NWACP, Annex 5000 Area Contact List Links.

E.1 The ERTV

As of July 1, 2010, the maritime industry of Washington, represented by the ERTV Compliance Group, in association and agreement with Washington State Vessel Oil Spill Response Contingency Plan holders, has chartered and arranged to fund a year round Emergency Response Towing Vessel (ERTV) located in Neah Bay, Washington. The ERTV was contracted to comply with the requirements of Washington State Engrossed Substituted Senate Bill 5344 (the Act), passed during Washington State's 2009 legislative session.

The ERTV is contracted for oil spill response contingency plan citation and for use during vessel emergencies by owners or operators of vessels transiting to or from a Washington port through the Strait of Juan de Fuca, except for transits extending no further west than Race Rocks light. The Marine Exchange of Puget Sound (Marex) as agent for the ERTV Compliance Group tracks and assesses fees from all applicable vessels transiting the Strait of Juan de Fuca to or from a Washington port, other than ports on the Columbia River.

As defined in the Act, a vessel emergency means a substantial threat of pollution originating from a covered vessel, including loss or serious degradation of propulsion, steering, means of navigation, primary electrical generating capability, and sea keeping capability. The ERTV is available to respond to vessels with vessel emergencies in the Strait of Juan de Fuca and off the western coast of Washington State from Cape Flattery light in Clallam County, Washington south to Cape Disappointment light in Pacific County, Washington. The ERTV may also be contracted for by other vessels.

E.2 Notifications and Dispatch

Decisions to dispatch the ERTV in response to a vessel emergency shall be made by the Covered Vessel or representative, and/or the government agencies with authority to order ERTV assistance. In the event of a decision to dispatch the ERTV, the Covered Vessel owner, operator or demise charterer, or the government agency that dispatched the ERTV will contract directly with the ERTV owner in a form mutually agreeable to both parties. The party contracting for the ERTV shall be responsible for all of the ERTV costs, including its hire, fuel and lube oil, from the time of dispatch of the ERTV until its return to its station.

E.3 Provisions for State Use of the ERTV

Ecology may contract with the ERTV operator in order to respond to a potentially emerging maritime casualty or as a precautionary measure during severe storms. Ecology may dispatch the ERTV upon contracting with the ERTV operator. Ecology shall pay all costs for such deployment from the time of the ERTV's dispatch until its return to its station.

E.4 Drills

Ecology may determine the adequacy of the ERTV through practice drills that test compliance. Such practice drills may be no-notice drills. The ERTV may be also be used in NRC/NRCES Plan drills as needed to meet Ecology drill requirements. Drills will emphasize the ERTV's ability to respond to vessel emergencies. Drill credit can be obtained during a single deployment by following Ecology's guidelines for scheduling and participating in drills. An actual deployment provides an opportunity for requesting drill credit.

E.5 ERTV Use Report

Whenever the ERTV is deployed at the request of the vessel's owner or operator during a vessel emergency, the requesting vessel owner, operator or demise charterer shall submit a written report to Ecology as soon as practicable regarding the emergency response system deployment, including photographic documentation (if the situation allows for safely taking photos and/or video). The report shall provide a detailed description of the incident necessitating a response and the actions taken to render assistance.

E.6 ERTV Information to NRC/NRCES Members

Additional background information about the capabilities of the ERTV and further guidance on the process and procedures to contract and activate the ERTV is available on the Marine Exchange of Puget Sound website at:

http://marexps.com/supporting/ertv

The NRC/NRCES Notification Placard and Field Document contain the following information:

> An Emergency Response Towing Vessel (ERTV) is stationed at Neah Bay available to be hired by vessels experiencing a vessel emergency while in the Strait of Juan de Fuca and off the western coast of Washington State from Cape Flattery Light south to Cape Disappointment Light.
>
> **For ERTV Call 206-281 3810 or 800-562-2856**