



PARADIGM



ALASKA
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PREVENT / RESPOND / PIONEER

RUBY MARINE



WAK-PC Workshop

February 12–13, 2025

High level takeaways – on criteria

- Mechanical equipment – use the current VRP regulations for:
 - Skimming and booming equipment capacity
 - What's required for a contract
- Mechanical equipment – different from current VRP regulations:
 - For temporary storage, assume a 3:1 ratio for available non-dedicated barge capacity
 - Strategic locations for hubs are important & required – **how prescriptive should the locations be & what should be required at them?**
 - Specific timing requirements should focus on activation/mobilization – **how do we define mobilization? how do we address arrival on scene & create check-the-box that acknowledges reality?**

High level takeaways

- The “additional considerations” should be part of the regulations
- Covered vessels must:
 - broadcast AIS when in the COTP Zone
 - have real-time monitoring shore based in Alaska (24/7),
 - able to monitor changes in status of vessel that is broadcast
 - able to communicate directly with the bridge of the vessel
 - follow approved IMO routing measures in region when transiting
 - notify the monitoring operation when deviation is needed

High level takeaways

- USCG shared that they are focused on:
 - Requiring contracting for all available resources
 - Emergency towing

Time requirement



Wildlife response

International Bird Rescue photo of cleaned Crested Auklets
after *M/V Selendang Ayu* spill <https://www.birdrescue.org/2005-selendang-ayu-alaska/>

Statute

OSRO requirements (IV) include:

- (IV)(ff) has wildlife response resources for primary, secondary, and tertiary responses to support carcass collection, sampling, deterrence, rescue, and rehabilitation of birds, sea turtles, marine mammals, fishery resources, and other wildlife.

Criteria overall include:

- (VII) Managing wildlife protection and rehabilitation, including identified wildlife protection and rehabilitation resources in that area.

Context

- No requirements in USCG VRP regulations regarding wildlife
- “Wildlife Protection Guidelines for Oil Spill Response in Alaska” (2020) adopted by Regional Response Team and referenced in state regulations
- NOAA’s National Marine Fisheries has 2023 guidance for marine mammal response preparedness in Alaska
- Alaska has plan requirements applicable to some vessels

Context – Wildlife Protection Guidelines

WILDLIFE PROTECTION GUIDELINES FOR OIL SPILL RESPONSE IN ALASKA



Alaska Regional Response Team
Wildlife Protection Committee
Version 2020.1
August 31, 2020

- Regulatory and permit requirements
- Wildlife response strategies
- Checklists and tools for permits/authorizations, wildlife reconnaissance
- Guide to develop wildlife response plan
- Reference to other related plans (marine mammal response)
- Relevant contacts
- Includes rat protection

Context - Wildlife Protection Guidelines

Primary Strategies

Keep the spilled oil away from wildlife and their habitats

Controlling the release and spread of spilled oil and removal of oiled debris, including oiled carcasses, from the environment.

Secondary Strategies

Keep wildlife away from spilled oil

Hazing/deterring wildlife from oiled areas to clean areas, and pre-emptive capture, handling, transport, and release of oiled or injured wildlife.

Tertiary Strategies

Respond to impacted wildlife

Capture, handling, transport, cleaning, rehabilitation, holding, and release of oiled or injured wildlife.

Context - State requirements

18 AAC 75.449(a)(6)(M)

Spill response scenarios must describe:

- methods and a description of equipment to protect, recover, dispose, rehabilitate, and release potentially affected wildlife
- align with practices and recommendations in the WPG
- can seek ADEC approval for other approaches

18 AAC 75.451(g)

List “contracted or other” equipment to “protect and recover wildlife”

Context - Marine mammal response

NOAA/NMFS 2023 standards described for “Responsible Party”

Preparedness Thresholds – for 1st week of response

Pinnipeds (seals, sea lions)

- Sample 50
- Store 1,000 samples
- Clean and rehabilitate 25

Cetaceans

- Sample 5
- Clean and rehabilitate 2 (small)

Both

- Necropsy 50
- Store 1,000 samples

Implemented via OSROs > Alaska SeaLife Center ...???

(Does not include birds or other species included.)

Questions

1. Is it fair to assume that anything included in USCG regulations should align with WPG?
2. What type and level of resources should an OSRO be required to “have” (contracted?)?



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Ocean
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RESOLVE
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BREAK (back at 11:00 am)



Response equipment on board barges



Photos from Alaska Petroleum Distributors and Transporters' APC for Tank Barge Transport of Non-persistent Group I Fuels (Rev 5)

Outline

- Statute section
- Context on barges in Alaska and current APC and requirements regarding on-barge response equipment

Statute

(V) With respect to tank barges carrying non-persistent oil in bulk as cargo, oil spill response resources that are required to be carried on board.

gasoline, diesel fuels, aviation
fuels,

evaporation likely
flammability hazard
toxic in marine environment
residue unlikely

Context – barge fleet (WAK/PWS)

~36 barges of various sizes deliver non-persistent fuel throughout Western Alaska and PWS Alaska coastal areas and some rivers

Barge capacities range from a few thousand to almost 200,000 bbl (as of 2015 APD&T APC)

Context - regulatory

- The Alaska Petroleum Distributors & Transporters (APD&T) APC has covered tank barges carrying non-persistent fuels around Alaska since 1993.
- Operators have USCG VRPs and Alaska Oil Discharge Prevention and Contingency Plans

USCG requirements

- ◉ **§ 155.210 Discharge removal equipment for vessels less than 400 feet in length.**

- (a) Oil tankers and offshore oil barges with an overall length of less than 400 feet must carry appropriate equipment and supplies for the containment and removal of on-deck oil spills of at least 7 barrels.
- (b) The equipment and supplies must include—
 - (1) Sorbents;
 - (2) Non-sparking hand scoops, shovels, and buckets;
 - (3) Containers suitable for holding recovered waste;
 - (4) Emulsifiers for deck cleaning;
 - (5) Protective clothing;
 - (6) A minimum of one non-sparking portable pump with hoses; and
 - (7) Scupper plugs.
- (c) During cargo transfer operations, the equipment and supplies must remain ready for immediate use.

Current federal requirements

Response equipment requirements for transfer-related spill (“average most probable discharge”) compared to APD&T resources on board

	Requirements in USCG Regulations 33 CFR 155.1050(d) (without APC)		APD&T APC + skiff, pumps/hoses to offload largest tank in 24 hours
Equipment Type	Equipment for Average Most Probable Discharge	Timing (within 12 miles of shore)	Immediate - items are on board and crews are trained in deployment
Boom	2x length of longest vessel involved	Deployed within 1 hour of spill detection	3x barge length (~ 1,000-1,200 ft on larger barges, including boom to use if skimmer deployed outside containment)
Skimmer	Up to 50 bbl of effective daily recovery capacity (EDRC), or 1% volume, whichever is less	On-scene within 2 hours of spill	50% of the <u>Maximum</u> Most Probable Discharge* (10% barge capacity up to 2,500 bbl) – for 25,000 bbl barge, 1,250 bbl EDRC
Storage	At least 100 bbl of storage capacity	On-scene within 2 hours of spill	10% capacity of each of two largest tanks kept available for storage (varies widely)

*MMPD level of skimming capacity is required in 24 hours in current regs for a barge with 25,000 bbl capacity or larger

Questions

1. Should new regulations codify what is in the current APC?
2. If not, what should be different and why?
 - What are the constraints (space on deck, etc.)?

Non-mechanical (OSRO requirements)

Outline

- Statute Context
- Questions

Statute – OSRO requirements

(IV) Ensuring the availability of at least 1 oil spill removal organization that is classified by the Coast Guard and that—

....

(ee) has non-mechanical oil spill response resources capable of responding to a discharge of persistent oil and a discharge of nonpersistent oil, whether the discharged oil was carried by a vessel as fuel or cargo; and

....

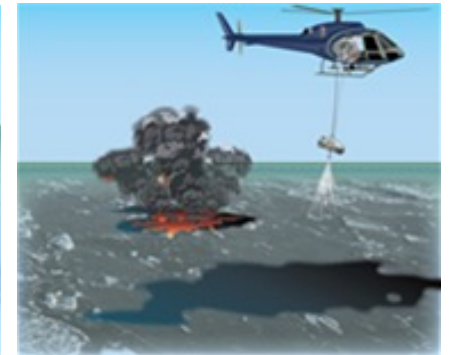
Context – non-mechanical response

Primary non-mechanical response methods for crude, other heavy oils

DISPERSANTS



IN-SITU BURNING



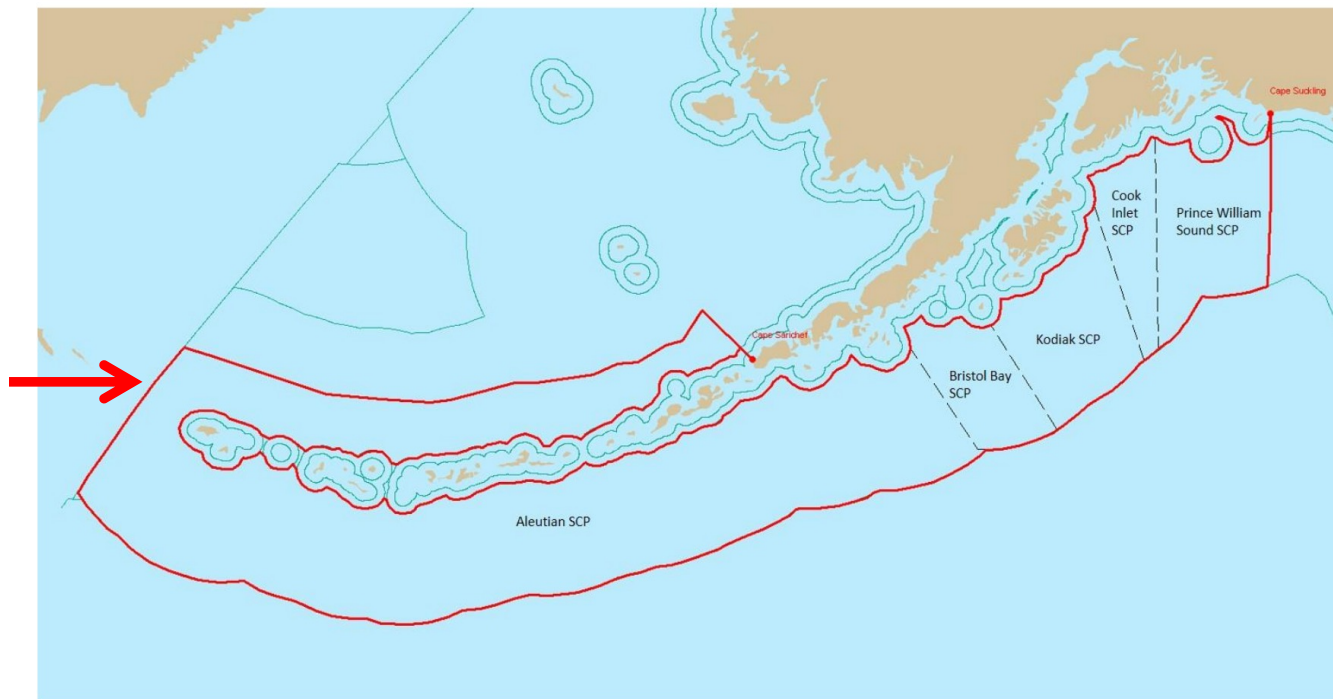
Context – regulatory

Current USCG VRP regulations require planning for dispersant application starting by 7 hours

If vessel travels through “pre-authorized” dispersant area

Excludes non-persistent cargo, but *includes* animal fats/oils as cargo

(No planning requirements for in-situ burning)



Dispersant Use Plan for Alaska, Rev 1 (2018). Alaska Regional Response Team.

Context – regulatory (cont.)

- Third party contractors are available to provide dispersants in Alaska to meet the current federal requirement
- Use of dispersants outside the pre-authorized zone requires incident-specific approval by Regional Response Team
- ADEC regulations do not require non-mechanical capabilities, but if an operator proposes to use these methods they must describe the resources to be used in their plan (crude oil tankers)

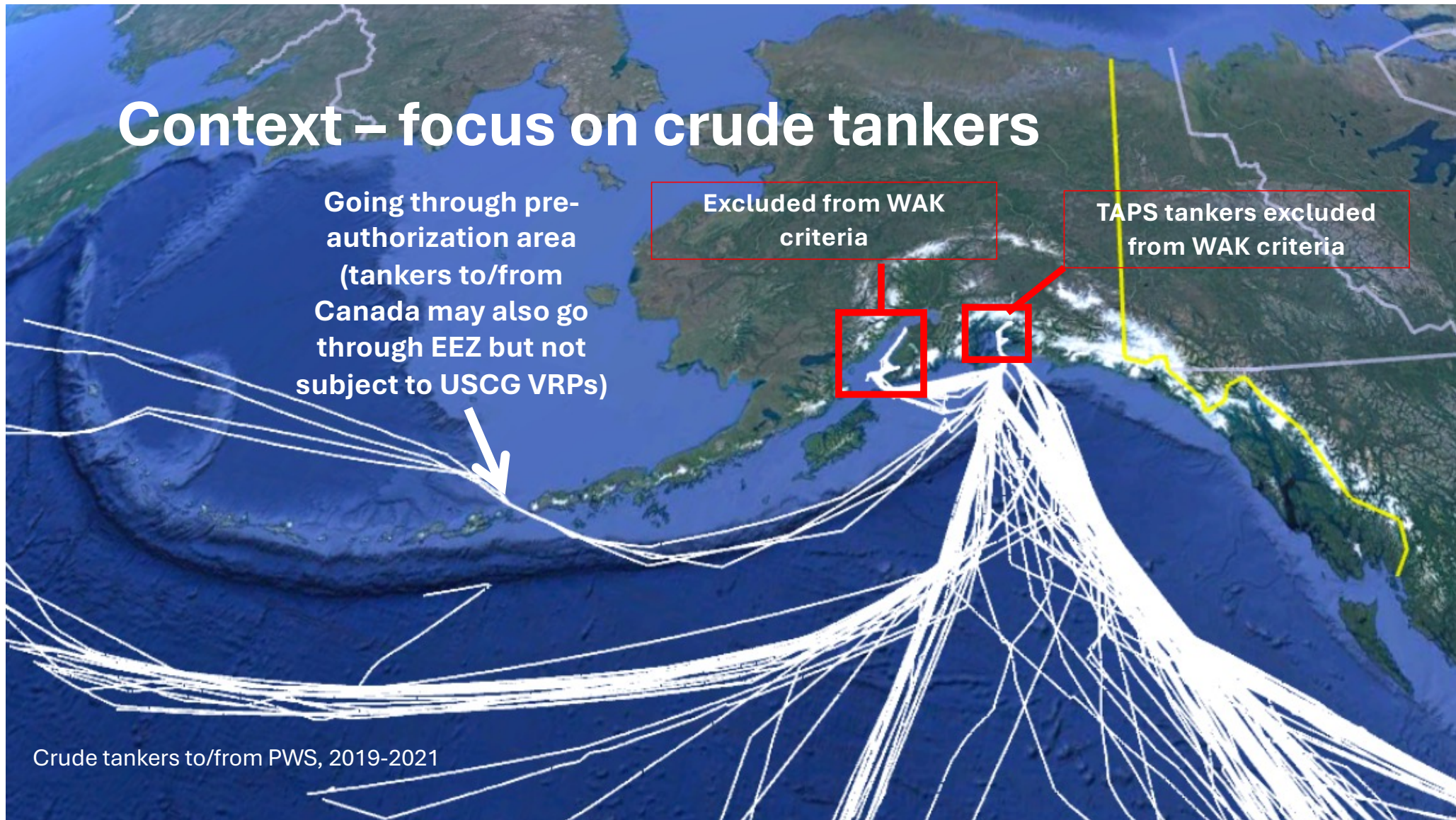
Context – focus on crude tankers

Going through pre-authorization area
(tankers to/from Canada may also go through EEZ but not subject to USCG VRPs)

Excluded from WAK criteria

TAPS tankers excluded from WAK criteria

Crude tankers to/from PWS, 2019-2021



Questions – non-mechanical

1. Should the new requirement for non-mechanical response capability be the same as it is in current regulations?
 - Should it focus on a specific cargo/fuel type?
 - Should it focus on pre-authorized areas only?
 - How should it be validated?

Plan approval – statute & question

(VI) Specifying a minimum length of time that approval of a vessel response plan is valid

5 years?

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Other parking lot issues?

- Conflict avoidance (mention Polar Code?)
- Innocent passage
- Emergency towing