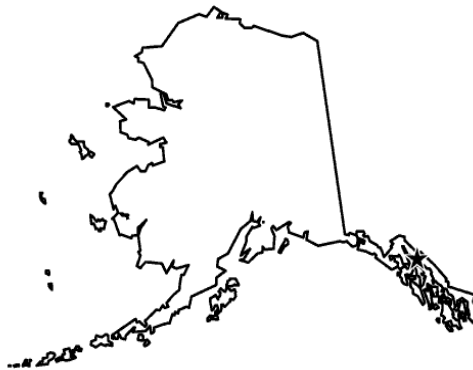


Western Alaska
Alternative Planning Criteria (WA-APC-T)
For Oil Tankers Operating in Western Alaska
May 9, 2011



Submitted by:
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WA-APC-T

Western Alaska-Alternative Planning Criteria for Oil Tankers

May 2011

Background: This Western Alaska oil spill response Alternative Planning Criteria for Oil Tankers (WA-APC-T) was developed in consultation with affected vessel operators and the oil spill response community to provide additional pollution prevention measures above those requirements currently found in the regulations as a practical alternative to full compliance with the *Rules for the Protection of the Marine Environment Relating to Oil tankers Carrying Oil in Bulk* (33 CFR 155). The submission and acceptance of an APC is allowed for by Coast Guard CG-543 Policy Letter 09-02 when compliance with the regulations cannot reasonably be achieved. This APC does not address or seek relief from the Shipboard Marine Firefighting and Salvage regulations that became effective in February 2011.

The premise for this APC is that full compliance with the federal oil spill response regulations pertaining to self propelled tank vessels operating in the more remote areas of *Western Alaska* is not presently possible as equipment does not exist to meet nearshore, offshore and open ocean requirements as further defined in the attached gap analysis, and full compliance is unfeasible due to costs and the lack of support infrastructure thus warranting applying alternative planning criteria focused on capabilities and measures that enhance oil spill prevention. This APC, in conjunction with oil spill removal capabilities, provides for practical oil spill prevention measures and capabilities above those required in the regulations and overall better achieves the environmental protection objectives of OPA-90.

This APC applies to the following:

Oil tankers: Consistent with Coast Guard regulations in 33 CFR 155.1020, an oil tanker means a self-propelled vessel carrying oil in bulk as cargo, including integrated tug-barges as found designed for push-mode operations.

Western Alaska: For the purposes of this APC, *Western Alaska* refers to the waters of Coast Guard Sector Western Alaska and Captain of the Port as defined in 33 CFR 3.85-15, encompassing U.S. waters in the North Pacific Ocean, Bering Sea, Chukchi Sea and Beaufort Sea not including the waters of Prince William Sound and Cook Inlet where existing oil spill removal capabilities meet the Coast Guard regulatory requirements.

Annually, based on 2010 vessel traffic data, there are approximately 50 oil tanker port calls and transits of *Western Alaska's* waters through the Aleutians and the Arctic. To fully comply with the federal oil spill response regulations these vessels would be faced with the burden of funding the prohibitively high cost of procuring and maintaining required oil spill response resources. When

considering the small number of tank vessels, the large distances, remote and extreme operating environment and limited port and maritime infrastructure in *Western Alaska*, full compliance with the oil spill removal requirements is not economically or practically viable. As oil spill removal resources presently do not exist in all regions of *Western Alaska* the tank vessels do not fully meet the oil spill response planning requirements today. Presently, the only Alaska based Coast Guard approved and rated Oil Spill Removal Organization (OSRO) available to oil tankers operating in *Western Alaska* outside Cook Inlet and Prince William Sound is Alaska Chadux, which is rated for inland oil spill response per the Coast Guard’s OSRO criteria and rating system. While Chadux has effectively responded to major oil spills in *Western Alaska* most notably the Selendang Ayu, it does not have the spill response resources required for oil tankers to fully meet the Coast Guard oil spill response regulations in Western Alaska.

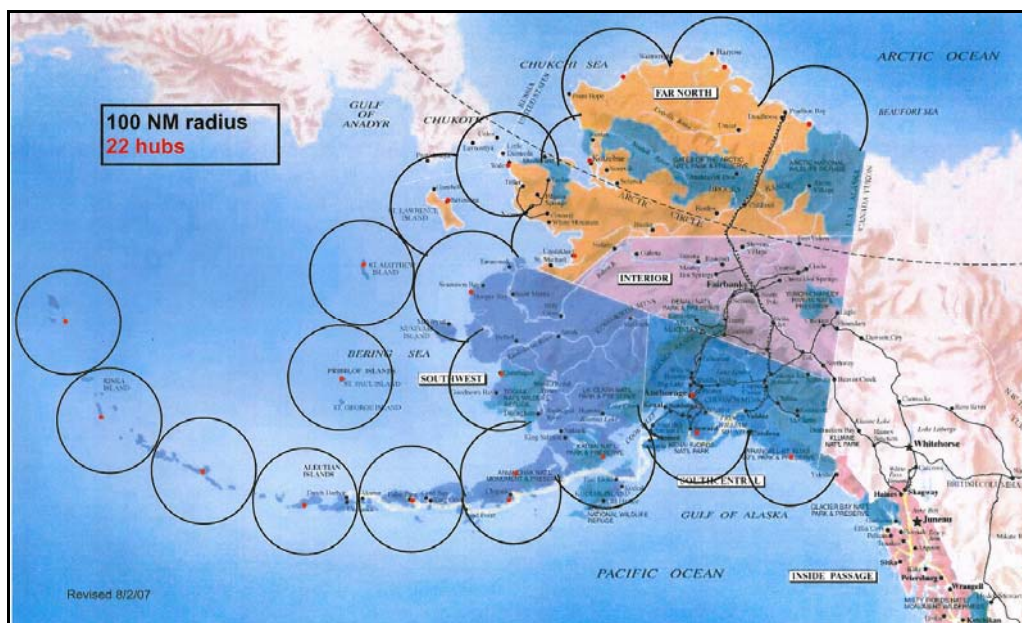
This APC meets the environmental protection objectives of OPA-90 and the Coast Guard regulations through applying the principles of “an ounce of prevention is worth a pound of cure” and establishing risk reduction operating procedures and providing and locating strategic response resources including Emergency Towing System (ETS) equipment and vessel tracking systems that can locate vessels that can render assistance that together can help prevent marine casualties that lead to oil spills in *Western Alaska’s* unique operating environment.

The justification for adopting this APC is represented by the below graphic that shows the size of *Western Alaska’s* maritime region compared to the lower 48’s coastal areas. To fully meet the existing Coast Guard oil spill regulations applicable to oil tankers operating in *Western Alaska* the procurement and staging of required oil spill removal equipment in this region would exceed what is required and available on the entire West Coast, a capability that is not practical or economically viable. Furthermore, the infrastructure in *Western Alaska* does not presently exist for staging and deploying oil spill removal equipment, support vessels and personnel as required by the regulations.



Further preventing the procurement, staging and maintenance of oil spill recovery resources sufficient to meet the regulations is the small number of oil tankers that would be required to bear the exorbitantly high cost of acquiring and maintaining the equipment which amortized over approximately 50 port calls and transits annually would result in tankers having to pay an assessment approaching several hundred thousand dollars each time a tank vessel engages in an activity subject to the oil spill regulations. These exorbitant costs would effectively end tank vessel port calls and operations in *Western Alaska*.

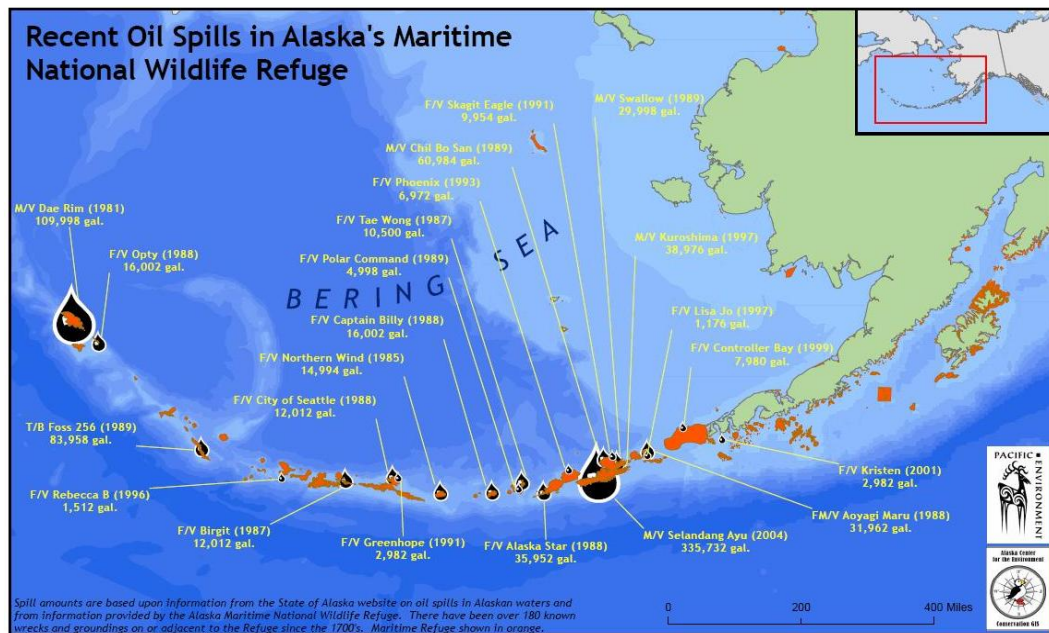
The present gaps in oil spill response capabilities and the cost of meeting full compliance with the regulations are outlined in the attached Estimated Cost Analysis and Oil Spill Response Gap Analysis. The graphic below shows where response hubs with vessels, personnel and other equipment would need to be established, in many cases where no infrastructure exists, to meet the regulatory requirements of responding to a maximum most probable discharge in offshore waters in 24 hours. The cost analysis provided as enclosure (1) to this document outlines conservative cost estimates of \$483M to establish and operate the required response capabilities the first year and \$230M a year thereafter operating costs. These unachievable financial and operational burdens compel adoption of alternative planning criteria tailored to *Western Alaska* that implements measures that will reduce the risk of incidents leading to oil spills, the need for spill removal equipment, and better addresses the environmental protection objectives of OPA-90.



Western Alaska Response Hubs Needed for Full Compliance

Upon taking into consideration past maritime casualties and oil spills in *Western Alaska* that have occurred outside protected waters it is evident open water oil spill recovery is not effective, safe or realistic. As represented in the historical graphic of maritime incidents in the Aleutians on the following page, most casualties in *Western Alaska* have been caused by vessels running aground

resulting in the oil impacting the shore in a matter of hours. In these instances near shore and on shore oil spill recovery are the only viable options. In almost all cases, offshore open water oil spill recovery equipment would have been ineffective in reducing the environmental impacts incurred by these incidents due to the prevailing harsh weather and sea conditions in this region. Risk reduction measures, such as offshore routing and emergency response capabilities provided by tugs of opportunity equipped with emergency towing systems could have prevented some of these incidents and been more effective in protecting the environment than using open water oil spill recovery equipment after the vessels grounded and spilled oil. In addition to preventing the oil spills, risk reduction and prevention measures could also save lives and property and protect natural resources.



Summary of Issues: The following summarizes why the adoption of this APC is appropriate:

1. **Full compliance is not a viable option:** Full compliance with the existing oil spill response regulations is not economically or practically viable for the extreme operating environment off the coast of *Western Alaska*. While meeting the oil spill response requirements for the inside waters of Prince William Sound and Cook Inlet have been addressed to the level required of the regulations, the Gulf of Alaska (North Pacific), Bering Sea, Chukchi Sea and Beaufort Sea are large exposed bodies of waters bordered by small remote communities with limited infrastructure that together make full compliance with the oil spill response regulations unfeasible.
2. **Undesirable Consequences:** Enforcement of the regulations as written could lead to the undesired consequences of increased risk, increased consumption of fuel oil, less response

oil spill removal (caches of oil containment boom and skimmers) and oil spill prevention resources (ETS and vessel tracking) being available, negative impacts on U.S. trade and high costs to Alaska communities. Vessels transiting the waters of *Western Alaska* would be forced to make a decision to either pay the disproportionately high costs for spill response caches in Alaska or sail on more exposed and longer routes that would increase fuel consumption and increase risk. Vessels could also avoid the high cost of complying with the regulations by substituting foreign port calls for U.S. port calls, negatively impacting U.S. trade. A tank vessel previously loading oil in San Francisco destined for the Arctic port of Tuktoyaktuk in Northwest Territories, Canada and sailing through Alaska waters would not be subject to the spill response regulations if they loaded oil cargo in a foreign port such as Vancouver or Prince Rupert. In such cases the route through Alaska waters and associated risks would be the same, however, as the voyage would be innocent passage, the vessel would not be required to have spill response resources on contract. The end result would be the oil tankers that cannot avoid calling on Alaska ports would pass on the high cost of complying with the regulations to the communities they are delivering oil to.

3. Oil Recovery is Less Effective in Protecting the Environment than Prevention Measures: The history of maritime incidents in *Western Alaska* has shown open water recovery of oil has been ineffective, with most oil recovered on the shoreline and in the near shore environment in less exposed waters. Even near shore oil spill recovery efforts were frequently limited by the extreme operating environment. While oil recovery and removal resources are needed, greater returns in protecting the environment can be obtained by implementing risk reduction measures and procuring response capabilities (vessel tracking and ETS) that prevent marine casualties that lead to oil spills, and the saving of lives and property .

WA-APC-T Provisions: In addition to enhancing existing oil spill removal capabilities, this APC proposes a combination of oil spill prevention “capabilities” and “measures” that collectively will best meet the environmental protection objectives of Coast Guard regulations applicable to oil tankers operating in *Western Alaska*.

The three legs of this APC are:

1. Oil spill removal/recovery equipment: Upon approval of the APC, an implementation plan will be developed to enhance the current equipment caches as well as develop additional strategically placed equipment response hubs in *Western Alaska*. This plan will be shared with the Coast Guard and the Alaska Department of Environmental Conservation within 6 months after approval.

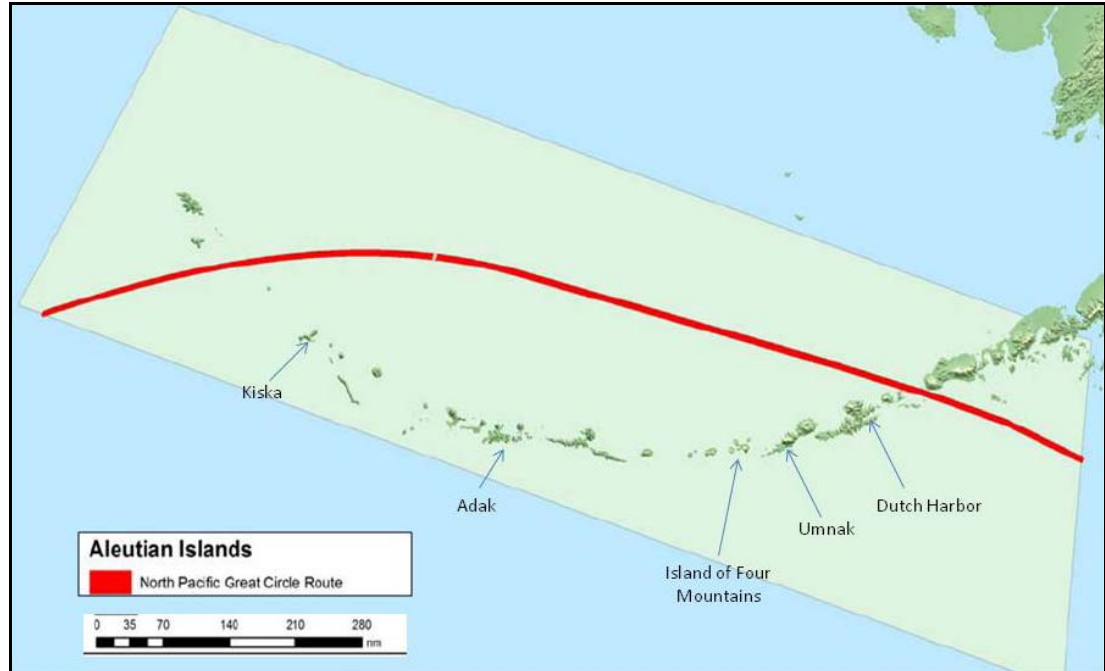
2. Risk Reduction: Implementation of additional oil spill prevention/risk reduction measures comprised of vessel routing, immediate notification of hazardous conditions by vessel operators and operation of Automatic Identification System (AIS) vessel tracking system.
3. Spill Response and Prevention: Procurement and staging of additional oil spill response and prevention capabilities comprised of:
 - Expanded oil spill removal resources and the implementation of AIS and satellite vessel tracking of tugs, emergency response vessels and other vessels that may assist a disabled vessel to prevent it from grounding or foundering and releasing oil into the environment.
 - Procurement and strategic staging of Emergency Towing System (ETS) for deployment on tugs of opportunity.
 - Participants in the WA-APC-T will have by contracts or other approved means access to oil spill response resources through a regional OSRO in *Western Alaska*, as well as access to Tier 3 offshore, open ocean and nearshore response capabilities from out of region when these capabilities are not available in the area of coverage.

WA-APC-T Components: The specifics of implementing the above “prevention” and “response” measures are outlined below. The Marine Exchange has worked with other stakeholders in the Alaska maritime community to establish the non-profit Alaska Maritime Prevention & Response Network, the “*Network*”, to facilitate and manage the implementation of this and other APCs as needed. Oil tankers opting to meet the Vessel Response Plan regulations through adoption of the WA-APC-T provisions will agree in writing to the following:

1. Advance Notification to the Coast Guard of Intended Transits: WA-APC-T vessels will provide 96 hour advance notice to the Captain of the Port (COTP) Western Alaska prior to entering the U.S. Exclusive Economic Zone to which the pollution regulations apply, of the following:
 - Time of planned transit and port calls
 - Planned north or south transit of the Aleutians
 - Vessel contact information; i.e. satellite phone or e-mail contact info
 - Commitment to comply with WA-APC-T criteria
2. Sail on Routes that Reduce Risk: WA-APC-T vessels will sail lower risk routes as outlined below or notify the Captain of the Port Western Alaska before deviation if the reduced risk routing measures cannot be complied with along with an explanation of why a deviation is

required.

In the Aleutians region of *Western Alaska*: (See the chartlet below that depicts the routes followed by most vessels transiting the Aleutian Islands)



Aleutian Island's Low Risk Route

- On a route that place them well offshore (no closer than 75 miles from the Islands of Four Mountains) and central Aleutians where response resources are limited. This route will provide more time for assistance to be provided before a disabled vessel drifts ashore.
- When on a route north of the Aleutians, sail on the Great Circle route north through the Aleutian Chain in the vicinity of Unimak Pass and south through the Aleutians west of Adak to provide a safe distance, no closer than 75 miles from shore offshore. When making *Western Alaska* port calls, variances from the reduced risk route will only be modified to safely navigate to and from the port.
- When on a route south of the Aleutians, sail no closer than 75 miles from shore to provide a safe distance except when making *Western Alaska* port calls in which case this route should only be modified to safely navigate to and from the port.

In the Arctic region of *Western Alaska*:

- On a route that place them no closer than 10 miles from the shore in the Beaufort and Chukchi Seas when in U.S. EEZ.
3. Implementation of Vessel Traffic Management System (VTMS): Within six months after APC approval, WA-APC-T vessel operators will support the implementation of a 7x24 industry operated VTMS that will monitor compliance with the risk reduction routing measures as well as track the locations of response resources. The system will through a network of strategically positioned AIS receivers:
- Automatically detect non-compliance with routing measures in certain areas
 - Make notifications of non-compliance to the vessel owner or operator with the intent to attain compliance
 - Notify the Coast Guard Captain of the Port of nonconformities
 - Aid response agencies and organizations by locating vessels able to provide assistance to vessels in distress
4. Timely Notice of Hazardous Situation and/or Reduced Propulsion: Vessels operating under the WA-APC-T will adopt the “Standard of Care” of notifying the Coast Guard of any hazardous condition, mechanical or structural failures, reduced propulsion due to mechanical deficiencies or need to conduct servicing or repairs while underway that affect propulsion, or other vessel casualties incurred while operating within 200 miles of Alaska’s shores. The notification shall be made within one hour of occurrence and the master of the vessel will ensure hourly updates and position reports are provided to the Captain of the Port until the situation is resolved to the satisfaction of the Coast Guard. A “Hazardous Condition” as defined in 33 CFR 160.204 which includes but is not limited to any condition that may adversely affect the safety and seaworthiness of any vessel, bridge, structure, or shore area or the environmental quality of any port, harbor, or navigable waterway of the United States. It may, but need not, involve collision, allision, fire, explosion, grounding, leaking, damage, injury or illness of a person aboard, or manning-shortage.
5. Support for the Implementation of the WA-APC-T: Vessels operating under the WA-APC-T will support through protocols, agreements and contracts and comply with:
- Report a marine casualty meeting the definition in 46 CFR 4.05-1 within 1 hour of occurrence to the Captain of the Port Western Alaska.

- The implementation and administration of the WA-APC-T through the Alaska Maritime Prevention & Response Network , “*Network*” .
 - *The Network* will develop a plan to augment existing spill prevention and response equipment maintained and deployed by established OSROs and other resource providers in *Western Alaska*.
 - The operation and expansion of the Alaska Maritime Safety Net comprised of AIS (Automatic Identification System) receiving stations in *Western Alaska* and the installation and operation of satellite tracking transponders on towing vessels that may be able to assist a disabled vessel. Note: Tracking of regional towing vessels, installation and operation of an AIS receiving station in the Aleutians on Umnak Island and 7x24 compliance monitoring will be implemented by the *Network* within six months of approval of the WA-APC-T.
6. Port Call Risk Reduction Measures: Oil tankers operating under this APC will comply with the following to reduce the risk of environmental incidents when making port calls in *Western Alaska*.
- The vessel provides 96 hour advance notice of port arrival and transfer to the Captain of the Port.
 - The vessel will proceed at minimum safe maneuvering speed for the prevailing conditions when entering territorial seas while entering or departing port.
 - The vessel will not proceed to closer than 12 miles from the oil transfer port/facility until confirmation is received that a suitable escort towing vessel is immediately available to get underway and assist if needed.
 - The vessel will not proceed to closer than 3 miles from the oil transfer port/facility until a suitable escort towing vessel is in the immediate vicinity of the tank vessel available to assist as needed to ensure a safe transit and emergency towing gear on the oil tanker is operational and personnel standing by to the deploy towing gear or receive a line from the tug as the situation dictates.
 - Prior to conducting a transfer to a vessel or facility the vessel will verify with the receiving facility that an oil spill recovery barge, containment boom, deployment vessel(s) and personnel are immediately available to be deployed in the event of an oil spill.

- When transferring to a facility, the vessel shall ensure a single containment boom is deployed around the vessel unless tides, currents and weather preclude this from being done safely and or from being effective.
- The vessel will not conduct oil transfer operations when weather conditions preclude the ability to conduct a safe and effective oil spill response.
- If transfer operations conducted at night, operations will only be conducted if lighting meets requirements of 33CFR156.118.
- The vessel will not engage in simultaneous multiple vessel transfer to or from two cargo recipients (i.e. vessel and facility).
- The vessel will not conduct offshore lightering operations without prior clearance from the Coast Guard Captain of the Port.

Implementation of WA-APC-T: The initial implementation of this APC will be administered by the *Network* within 45 days of approval with proof of compliance with the above provided through agreements, protocols and other correspondence as well as vessel tracking records.

Within six month of approval of this APC, the *Network* will provide to the U.S. Coast Guard Sector Anchorage and the Alaska Department of Environmental Conservation a status report on the development of the *Network*, implementation of this APC and a 5 year plan for "build out" of increased response resource capabilities in *Western Alaska*.

Regards,



Captain Edward E Page, USCG (Ret)
Executive Director
Marine Exchange of Alaska

Enclosure 1: Estimated Capital and Operating Costs for Oil Spill Response Caches

Enclosure 1: Gap Analysis

Projected Costs to Establish (Capital Costs) and Maintain (Operating Costs) 22 Oil Spill Response Hubs in Western Alaska to Meet Coast Guard Oil Spill Response Regulations

Notes:

1. These capabilities are based on oil spill response classification standards for the near shore environment.
2. Start up and operating costs based on research done from industry participants in southcentral Alaska
3. Prices for vessels are lease prices and thus recurring annual costs.
4. Capital start up costs do not include ancillary equipment, freight or labor
5. Budget does not include personnel costs to operate and maintain the networks which will vary by region.

RESPONSE HUB INITIAL CAPITAL COSTS	Quantity	Increment	Base price	
Shoreline Protective BOOM 18-42 inch	30,000 ft	\$18/ft	\$ 540,000	20" boom
Containers, 20ft. for protective boom storage	#15	\$3,000/ea	\$ 45,000	
Containment BOOM, ≥42 INCH, (1K ft)	1,000 Ft	\$70/ft	\$ 70,000	50" boom
Reel, ocean boom storage/1k ft/reel	#3	\$15,000/ea	\$ 45,000	
Containment Boom ≥42 INCH, (300 ft per skimmer)	300 ft	\$70/ft	\$ 21,000	
Skimmers	#2, AG Triton 600	\$1,300,000/ea	\$ 2,600,000	EDRC 4728/ea
SHALLOW WATER CAPABILITY - 20%				
Bay Class Skimming vessels (Class 4)	#2, 4-Lors2	\$700,000/ea	\$ 1,400,000	Total EDRC 9908 bbls
Landing craft, general purpose (Class 5)	#2	\$225,000/ea	\$ 450,000	
Small Boats, Nearshore (Class 6)	#10	\$30,000/ea	\$ 300,000	
Boom anchor systems, 3/1k ft	#3/100 ft	\$3,500/ea	\$ 210,000	#60-10 packs
Tracking Buoys	#2	\$2,000/ea	\$ 4,000	
PPE (Kits-6 man)	#10	\$3,500/ea	\$ 35,000	
Hazing	#4	\$5,000/ea	\$ 20,000	
Beach Cleaning (Kits-16 man)	#4	\$5,000/ea	\$ 20,000	
Decon Kits	#2	\$10,000/ea	\$20,000	
SUBTOTAL			<u>\$ 5,780,000</u>	
Personnel, Buildings, Storage and Start up Costs		20%	<u>\$ 1,156,000</u>	
TOTAL			<u>\$ 6,936,000</u>	
NUMBER OF HUBS - 22	22		22	\$ 152,592,000
ANNUAL OPERATING COSTS				
Tug, Ocean (Class 8), Twin Screw		\$8,000/day	\$ 2,920,000	
Tank Barge 300 ft (Class 11), 60k-80k bbls		\$5,000/day	\$ 1,825,000	
OSRV (Class 1),		\$12,000/day	\$ 4,380,000	
Annual Vessel costs			\$ 9,125,000	
Est Overhead, Personnel, Training & Admin 15%			\$ 1,368,000	
			<u>\$ 10,493,000</u>	
			22	\$ 230,846,000

Note: Total of First Year Capital Costs and Operating Costs = \$483M

Enclosure (1)

Gap Analysis for Alternate Planning Criteria (APC) Request

1. Reason and supporting information for this APC request:

This proposal is submitted by the Marine Exchange of Alaska on behalf of tank vessels intending to operate and or/transit the waters of COTP Western Alaska outside of Cook Inlet and Prince William Sound and cannot meet the requirements of 33 CFR 155.1050 due to the unavailability of commercial oil spill response resources which meet the national planning standards.

2. Regulations from which an APC is requested:

This Gap Analysis seeks relief from the regulations in 33 CFR 155 appendix B and the below listed oil spill response capabilities for nearshore, offshore and open ocean waters. This Gap Analysis is based on the larger tank capacity of the product tankers transiting *Western Alaska* waters in 2009 of 42,000 DWT transporting Group 1 and 2 oil products and the larger capacity crude oil tankers of 100,000 DWT transporting Groups 3 and 4 oil.

Response Resources Required for Worse Case Discharge Planning Volumes: The below tables provide computations for OPA 90 Group 1 and 2 oil tankers (approx .75 API) of approximately 360,000 barrels capacity and OPA Group 3 and 4 oil tankers (approx .96 specific gravity) of approximately 800,000 barrels capacity.

On Water Planning Volumes

Oil Group	Nearshore	Offshore	Open Ocean	
I	72,000	0	0	Note: Max Discharge Qty 360K
II	324,200	162,000	64,800	Note: Max Discharge Qty 350K
III	800,000	640,000	320,000	Note: Max Discharge Qty 800K
IV	560,000	448,000	224,000	Note: Max Discharge Qty 800K

Required Resources: On Water Recovery (bbls):

Group	Inland, Nearshore			Offshore			Open Ocean		
	Tier 1	Tier 2	Tier 3	Tier 1	Tier 2	Tier 3	Tier 1	Tier 2	Tier 3
I	10,800	18,000	28,800	0	0	0	0	0	0
II	48,600	81,000	129,600	16,200	26,730	34,020	3,888	6,480	7,776
III	120,000	200,000	320,000	64,000	105,600	134,400	19,200	32,000	38,400
IV	84,000	140,000	224,000	44,800	73,920	94,080	13,440	22,400	26,880
	Response Caps			Response Caps			Response Caps		
Caps	12,500	25,000	50,000	12,500	25,000	50,000	12,500	25,000	50,000

Note: All numbers in bold exceed the response caps in 33 CFR 155 listed in last row.

Enclosure (2)

Based on the above worse case discharge response planning requirements resources necessary to meet the regulations are as follows:

Group 1 Oils:

Nearshore: Tier 1= WCD 3 OSRO plus twice the cap
 Tier 2 and 3 = WCD 3 OSRO

Offshore: Tier 1, 2 and 3 = WCD 3 OSRO

Open Ocean: Tier 1, 2 and 3 = WCD 3 OSRO

Group 2, 3, and 4 Oils:

Tier 1, 2 and 3: WCD 3 OSRO plus twice the cap

3. Alternative procedures to provide for additional pollution prevention measures above those requirements currently found in the regulations:

Recognizing the effective responses to past oil spills in Western Alaska’s remote and harsh environment have been comprised of near shore and on shore recovery of oil, the focus on spill response equipment has been on obtaining equipment normally suited for inland oil spill responses. The only existing available OSRO to respond to spills in *Western Alaska* outside of Prince William Sound and Cook Inlet is Alaska Chadux Corporation, OSRO 93, which has accordingly developed the following oil spill response capabilities based on the RRI evaluation scale for the areas these tankers operate.

	MMPD	WCD1	WCD2	WCD3
River Canal	Yes	Yes	Yes	Yes
Inland	Yes	Yes	Yes	No
Nearshore	No	No	No	No
Offshore	No	No	No	No
Open Ocean	No	No	No	No

Due to the limited infrastructure in remote areas of *Western Alaska* where tankers operate the response strategy Chadux follows is comprised of mobilizing and cascading response equipment from strategically located caches which are shown in the following graphic.



The individual and cumulative listing of the response equipment at the caches depicted in the above graphic are provided below.

The abbreviations for the locations represent the following areas:

ANC= Anchorage BET= Bethel CDV= Cordova KEN= Kenai
 KOD= Kodiak DIL= Dillingham NOM= Nome SEW= Seward
 UNAK= Dutch Harbor, Unalaska Island. VDZ= Valdez BRW= Barrow

OIL CONTAINMENT EQUIPMENT INFORMATION

Type	IN FEET>	ANC	BET	CDV	KEN	KOD	DIL	NOM	SEW	UNAK	VDZ	BRW	TOTAL
20 in.		8300	3000	3000		3500	4000	3000		4000	4000	3000	35800
24 in.		1900			6200	1500			1000	5600			16200
30 in		1000				1000							2000
48 inch inflatable		600											600
10" fast water		4200	99	330									4629
													0
Whittier 20" boom		800											800
													0
Containment boom		12600	3000	3000	6200	6000	4000	3000	1000	9600	4000	3000	55400
Fast water		4200	99	330									4629

TEMPORARY STORAGE EQUIPMENT INFORMATION

TYPE - IN GALLONS	CAP	ANC	BET	CDV	KEN	KOD	DIL	NOM	SEW	UNAK	VDZ	TOTAL
Bladder, Kepner, tow	5000	2										10000
Bladder, Unitor, tow	6635	1										6635
Bladder, Canflex, tow	6600	1		1		1						19800
Bladder, Canflex, tow	2500									2		5000
Bladder, Canflex, tow	1250			1							1	2500
Bladder, Land	2500	2			2	2				2		20000
Fast Tank	1585	1							1			1585
Bladder, Land	10000	4										40000
Fast Tank	2400	9		3		1		1		1	3	40800
Bladder, Land	20000	6										120000
		211420	0	15050	5000	14000	0	2400	1585	12400	8450	270305
BARRELS:		5034	0	358	119	333	0	57	38	295	201	6436

OIL RECOVERY EQUIPMENT INFORMATION

Type - Manufacturer	bbl/h	EDRC ⁺ (bbls)	ANC	BET	CDV	KEN	KOD	DIL	NOM	SEW	UNAK	VDZ
Mini Max 30, Lamor	310	1488	1									
Mini Max 12, Lamor	76	365	2									
TDS-118, Elastec	134	643	1									
Desmi Mini-Max	220	1056	1							1		
12K, Vikoma	113	542	0			0	0				0	
Manta Ray, Slickbar	215	1032	4		2							2
Rope Mop C-24-D	20	96	3									
Rope Mop MW-41G	10	48				1	1					1
Rope Mop MW-41E	10	48	1		1							1
Stellar Suction Unit	208	998									1	
Rovac	204	979	1									
Skim-Pak 18000	428	2054			1	1	1				2	1
EDRC totals:			9360	0	4166	2102	2102	0	0	1056	5107	4214
All derated to 20%			Total EDRC:		28109 bbls							

4. Prevention and Mitigation Strategies:

As addressed in greater detail in the main APC document, the overall objective is to reduce the potential for incidents occurring that could lead to oil spills in addition to having oil spill response capabilities to recover oil that is released. These measures include:

- a. Advance Notification to the Coast Guard of Intended Transits: Vessels operating under the provisions of the WA-APC-T will provide 96 hour advance notice to the Captain of the Port Western Alaska.
- b. Sailing on Routes that Reduce Risk: WA-APC-T vessels will sail on lower risk routes in the Aleutians region of *Western Alaska*.
- c. Timely Notice of Hazardous Conditions and Reduced Propulsion: WA-APC-T vessels will adopt the “Standard of Care” of notifying the Coast Guard of any hazardous condition incurred while operating within 200 miles of the shores of *Western Alaska*.
- d. Support for the implementation of the WA-APC-T: Vessels operating under the WA-APC-T will support, through contracts and agreements, the implementation and administration of the APC by:
 - Contributing to the procurement of additional oil spill prevention and response equipment that will be maintained and deployed by the Alaska Chadux OSRO.
 - Contributing to the operation and expansion of the Alaska Maritime Safety Net comprised of AIS receiving stations in *Western Alaska*.
 - Providing satellite tracking transponders on towing vessels operating in *Western Alaska* that may be able to assist a disabled vessel.

5. Special Measures for Environmentally Sensitive Areas:

The waters of *Western Alaska* are replete with marine sanctuaries, wildlife breeding and feeding areas and sensitive fisheries, all of which can best be protected by the implementation of the above risk reduction operating procedures and measures and by having the ability to immediately locate tugs and other vessels that may provide assistance to a disabled vessel and averting a grounding and resulting oil spill.

6. Economic Impacts:

Due to the enormity of the *Western Alaska* maritime region full implementation of the oil spill response regulations would incur enormous capital and operating costs that would be disproportionately higher than any other region of the U.S. This would inevitably lead to the passing on of the costs of oil to small Alaskan communities which already incur the highest fuel rates in the nation with little, if any, enhanced environmental protection.