

PACIFIC STATES/BRITISH COLUMBIA

Oil Spill Task Force

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June 21, 2012

Docket Management Facility (M-30)
U.S. Department of Transportation
West Building Ground Floor, Room W12-140
1200 New Jersey Avenue SE.
Washington, DC 20590-0001

RE: Notice of Proposed Rulemaking "MARPOL Annex I Amendments"
[Docket No. USCG-20110-0194]

To the United States Coast Guard:

These comments are submitted on behalf of the U.S. member agencies of the Pacific States/BC Oil Spill Task Force; these agencies are the Alaska Department of Environmental Conservation, the Washington Department of Ecology, the Oregon Department of Environmental Quality, the Office of Spill Prevention and Response of the California Department of Fish and Game and the Hawaii Department of Health. Our comments address the Notice of Proposed Rulemaking published April 9, 2012 regarding "MARPOL Annex I Amendments."

The Pacific States/BC Oil Spill Task Force appreciates the U.S. Coast Guard's efforts to improve spill prevention in U.S. waters as demonstrated by the proposed regulations. We itemize specific regulations that we support as follows:

Additional Entries in the Oil Record Book, 33 CFR 151.25

The addition of the Oil Record Book entries to record the bunkering of oil, any failures of oil filtering equipment, and failures of the oil discharge monitoring and control system would improve the ability of both mariners and regulatory agencies to monitor the fate of used oil, bunkers and lubricants that are not easily tracked on all vessels. Record keeping of these possible sources of pollution would be an improvement over present record keeping procedures on many U.S. vessels.

Oil Fuel Tank Protection, 33 CFR 155.250

Limiting the size of fuel tanks and providing protection such as double bottoms for fuel tanks would be a major step forward in pollution prevention from compromised fuel tanks, since fuel tanks on most ships are not currently double bottom.

Prevention of Pollution during Transfer of Oil Cargo between Oil Tankers at Sea, 33 CFR 156.400–156.420

This rule would greatly improve the present system. We also recommend that transfer notifications be shared with potentially impacted states bordering the waters where the transfer would occur.

Pump-Room Bottom Protection, 33 CFR 157.14

Requiring double bottoms on cargo pump rooms would be a very good move forward in pollution prevention.

Accidental Oil Outflow Performance, 33 CFR 157.20

Limiting oil cargo outflow is a good move forward in pollution prevention.

Thanking you for this chance to submit comments on behalf of the Pacific States/BC Oil Spill Task Force, I remain,

Sincerely yours,

Jean R. Cameron

Jean R. Cameron
Executive Coordinator