

Oil Spill Task Force

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January 30, 2006
Submitted electronically

Docket Management Facility
US Department of Transportation
400 Seventh St. SW
Washington, DC 20590-0001

Re: (USCG- 2004-18939)

Pollution Prevention Equipment, Notice of Proposed Rulemaking Request for Comments, published November 3, 2005, Federal Register

Dear Madam/Sir,

These comments are submitted on behalf of the Pacific States/British Columbia Oil Spill Task Force whose membership includes the oil spill regulatory agencies of Alaska, British Columbia, Washington, Oregon, Hawaii, and California. Our member agencies have been active in promoting the investigation and prosecution of operators who bypass the oil/water separators on their vessels and illegally discharge oily wastes into our waters.

The effect of the proposed rulemaking is the incorporation of new International Maritime Organization (IMO) pollution prevention standards that close some loopholes, thus resulting in less pollution. Specifically, the new oil/water separator units will work better, thus removing some incentives to bypass the system. Moreover, the new standards for monitors/alarms should also make it more difficult to cover-up improper actions. Since the recording devices can record override actions, it will make accountability more likely.

Although the proposed rule should help prevent illegal oil discharges and protect our ocean environment, there are a couple of areas where the new standards fall short, however. We would prefer that the ship's speed and position data requirement include the Bilge Alarm as well as the cargo monitor. Also, the new rule does not prevent overriding data inputs for failed equipment.

Thanking you for your consideration of these comments on behalf of the member agencies of the Pacific States/BC Oil Spill Task Force, I remain,

Sincerely yours,

Jean Cameron

Jean R. Cameron
Executive Coordinator

cc: CAPT Paul Gugg, US Coast Guard Pacific Area