

**Summary Report on the
Oil Spill Response Readiness Roundtable
Sponsored by the Pacific States/BC Oil Spill Task Force
February 4, 2000
Alameda, California**

A. States/British Columbia Oil Spill Task Force

The States/British Columbia Oil Spill Task Force was formed pursuant to a Memorandum of Cooperation signed in 1989, following two West Coast oil spill incidents. The first involved the barge *Nestucca*, which spilled oil off the coasts of Washington and British Columbia in December of 1988; the second incident was the catastrophic spill by the T/V *Exxon Valdez* in Alaska's Prince William Sound in March of 1989. These events highlighted the concerns shared by west coast states and British Columbia regarding spill risks from coastal tanker traffic routes, the need for cooperation across shared borders, and a shared commitment among west coast citizens of both the US and Canada to protect their unique marine resources. The continuing focus of the Task Force is on enhancing the ability of its member agencies as well as other public and private stakeholders to effectively prevent, prepare for, and respond to marine oil spills.

B. Project Background

One project identified by the Task Force Members under their Spill Preparedness and Response Objective¹ in their 1999-2004 Strategic Plan, was to address issues of readiness, mutual aid, and the need for an inventory of response equipment on the West Coast. The Task description is as follows:

Organize a roundtable discussion including representatives of state/provincial and federal agencies, planholders, and response organizations to discuss issues and identify actions necessary to address shortfalls in response equipment or mobility of that equipment on the West Coast.

The Task Force Coordinating Committee decided to hold this "Response Readiness Roundtable" on February 4, 2000 in conjunction with their Winter Quarter meeting in Alameda, California.

C. Response Readiness Roundtable Summary

The following experts were invited to participate on two panels:

➤ Spill Response Equipment Inventories Panel, moderated by Rob Floerke, Assistant Deputy Administrator, Office of Spill Prevention and Response, California Department of Fish & Game:

- Ms. Jorice Williams, USCG NSFCC Operations Division
- Todd Busch, Marine Response Alliance
- Frank Marcinkowski, PCCI for Navy SUPSALV
- Gary Lillo, BP Exploration (Alaska), Inc.
- David Morris, Morris Environmental

➤ Response Equipment Mobility Panel, moderated by Mike Zollitsch, Oregon Department of Environmental Quality Spill Program Manager

- Steve Ricks, Clean Bay Cooperative
- Doug Lentsch, Cook Inlet Spill Prevention & Response, Inc.
- John Crawford, FOSS Maritime
- Martyn Green, Burrard Clean Operations
- Bill Rogers, Chevron Shipping, LLC

¹ "To enhance response capabilities on the West Coast"

Please reference Attachment A for biographical and contact information for each panelist.

The following persons also attended and participated in the Roundtable discussion: Ike Ikerd, Kyle Hanson, Kent Creighton, Joe Gross, and Frank Pellegrini for the *Marine Spill Response Corporation*; Chris Hall, consultant; Tom Copeland, *Prince William Sound Regional Citizens Advisory Council*; Ellen Faurot-Daniels, *California Coastal Commission*; CDR Paul Jewell, CDR John Koster, and CAPT Frank Whipple, *US Coast Guard*; Roland Miller, *Clean Sound Cooperative, Inc.*; Karen Hayes, *Alaska Tanker Company*; Steve Calanog and Donn Zuroski, *US Environmental Protection Agency, Region 9*; Roy Mathur, *California State Lands Commission*; Stan Norman and Roy Robertson, *Washington Department of Ecology*; Jonathan Boos, *Clean Pacific*; Barry McFarland, *Erst/O'Briens*; Kathleen Shimmin, *US Department of Interior*; Kevin King, *UK P&I Club*; Nick Salcedo, *San Francisco Bay Commission*; Brent Way, *Clean Rivers/MFSA*; Chris Klumpp and Michele Garcia, *California Office of Spill Prevention and Response*; CAPT Ed Irish, *Tesoro Maritime*; Steve McCall, *OSG Ship Management, Inc.*; Kenny Levin, *Pacific Merchant Shipping Association*; Paul Hankins, *SERVS/Alaska*; Ron Schoelich, *MFSA/Cowlitz Cleansweep*; Dave Peck, *Clean Bay*; Larry Dietrick, *Alaska Department of Environmental Conservation*.

In her welcoming remarks, Jean Cameron, Task Force Executive Coordinator, explained that the Task Force Members had adopted a Mutual Aid Agreement in 1996 which established protocols and procedures by which they would agree to release oil spill response equipment for the purpose of mutual aid, although such equipment was cited in contingency plans approved by their agencies. Nevertheless, remaining barriers to equipment mobility and response equipment inventories remained of concern to Task Force members. All roundtable participants as well as panelists were encouraged to help address these issues during the day's discussions.

The panelists' presentations and remarks, as well as the discussion among all participants is summarized by panel topic below. Topic-specific recommendations are included in the conclusion section of this report.

D. Oil Spill Response Equipment Inventories

Ms. Jorice C. Williams, US Coast Guard National Strike Force Coordination Center Operations Division

- The US Coast Guard (USCG) National Strike Force Coordination Center (NSFCC) maintains the Response Resource Inventory (RRI) as directed by the Oil Pollution Act of 1990 (OPA 90).
- The RRI provides information on the location of oil spill response equipment in the US organized by USCG Captain of the Port (COTP) areas. Both latitude and longitude identify each equipment site. Delivery distances are determined according to 35-mph travel time on land and 5 knots on water.
- There are twelve information categories in the RRI: beach cleaners, booms (including fireboom), dispersants and dispersant delivery systems, firefighting equipment, oil/water separators, portable storage equipment, vacuum systems, pumps, skimmers, vessels, logistical support equipment, and trained personnel. OSRO classifications are based on boom, skimmers, portable storage, vessels, and vacuum systems.
- Boom information includes length in feet. Skimmer capacity is measured in Effective Daily Recovery Capacity (EDRC) in barrels; portable storage equipment is measured in Temporary Storage Capacity (TSC) in barrels; and vacuum systems are quantified in both TSC and EDRC. Vessel capacity is calculated in TSC in barrels as well as onboard EDRC and boom.
- Non-dedicated equipment – specifically, equipment used for other purposes than spill response and therefore not set aside in a readiness status – is given half credit towards meeting Oil Spill Response Organization (OSRO) classification standards set by the USCG.
- Equipment totals include both equipment owned by an OSRO and equipment under contract. Inventory information includes data on the percentages of owned versus contracted equipment.

Duplication of contracted equipment is identified when data is compiled into single tables by equipment type; these tables help identify which OSRO is using a piece of equipment and whether that equipment is owned or contracted.

- OSROs provide data to the RRI on a voluntary basis, usually for the purpose of receiving a USCG classification by COTP zone and operating environments. There are four operating environment categories: Rivers, Inland, Oceans, and the Great Lakes. COTP designations may also include alternate cities within a COTP.
- The USCG sets standards for equipment quantities and delivery times that are used to classify OSROs. USCG site visits are used to verify that reported equipment and quantities. Any discrepancies may be used to update the RRI or change the classification status of an OSRO.
- Ms. Williams noted that 26 OSROs are classified to operate in Western States, of which nineteen are home-based on the West Coast. She provided handouts² which included specific listings as well as maps noting COTP locations, OSRO headquarter sites, and OSRO site information.
- RRI information is intended to be used for planning purposes such as equipment purchase decisions or decisions regarding the location of equipment stockpiles.
- OSROs are requested to update their equipment data if there is any change in equipment status of 10% or more. Equipment is regularly changed due to acquisitions, sales, upgrades, or changes in contracted equipment. The system is not intended to be a real-time information system. While the RRI is not considered to be 100% accurate, it is considered to be close.
- Changes of less than 10% are communicated to the Captain of the Port rather than to the RRI.
- Ms. Williams noted that three OSROs registered with the RRI were found to be out of business when contacted by the NSFCC pursuant to the USCG's proposed 25% increase in the TSC and EDRC standards.³
- Ms. Williams also noted that the OSRO classification process is expected to be revised to require stricter adherence to regulations as well as use of High Activity Centers within a COTP.
- The data collection process is also being revised from a DOS-based application to one that is Windows-based.
- The US Coast Guard is also updating the Marine Spill Response Resource Type List, which will be used or organize the data on the RRI.
- The RRI web site is www.uscg.mil/hq/g%2Dm/nmc/response/index.htm#OSRO; click on OSROs, then OSRO listing by COTP or by Company.
- USCG CAPT Frank Whipple noted that it is becoming common practice for the Captains of the Ports to verify OSROs cited in Advance Notices of Entry required of vessels.

Todd Busch, Director, Marine Response Alliance

- The Marine Response Alliance is a joint venture between Crowley Marine Services, Inc. and Marine Pollution Control, Inc.
- Asked to specifically address the issue of salvage equipment inventories, Mr. Busch noted that salvage equipment is so varied, as are the incidents to which salvors respond, that this category of "response equipment" does not really lend itself to "inventories" that can be distributed on paper.
- Crowley Marine Services, which Mr. Busch represents as Manager, Contracts & Emergency Services, maintains a fleet of ocean-class tugs, barges, and salvage equipment in nine ports on the West Coast, including some "fly-away" salvage equipment packs. These equipment packages are inspected and reviewed annually, and are available to all Crowley operations managers. Mr. Busch provided a list of these tugs and barges, as well as pumps and salvage equipment available from San Francisco, Seattle, Anchorage, and Captain's Bay, Alaska.⁴
- Vendor lists and subcontractors are available on an "as available, as needed" basis.

² Copies are available from Ms. Williams or from the Task Force office.

³ As announced in the 1/6/00 Federal Register Notice of Decision, the US Coast Guard proposes to increase the on-water mechanical recovery requirements by 25% as of April 5,2000.

⁴ Copies available from the Task Force office.

- Very little of the salvage equipment maintained by Crowley is dedicated to a stand-by status; if needed for emergency response, it must be mobilized or freed up on short notice.
- The *American Salvor*, Crowley's salvage tug, has on-board repair shops and an extensive equipment inventory.
- Experienced personnel such as salvage masters, engineers, and marine architects are critical to the success of a salvage operation. Such experts must have practical experience and be available to be on scene immediately.
- Crowley is a member of the International Salvage Union, which shares equipment among its members as needed. Membership also includes Smit, Titan, Donjon, and Wijsmuller,
- Mr. Busch noted that salvors do not drill and exercise, due to the nature of salvage equipment, which is expensive, and meant to operate under extreme conditions that are difficult to simulate. But many shipping companies have their vessel plans on file with salvors in the event of an emergency.
- Salvage contracting can be one tedious aspect of salvage response, but there are numerous standardized forms available as well as pre-approval agreements.

Frank Marcinkowski, PCCI, Representing Supervisor of Salvage, US Navy (SUPSALV)

- SUPSALV exists pursuant to the Salvage Facilities Act, which established it to "provide necessary salvage for both public and private vessels as determined to be in the best interest of the United States." SUPSALV is also cited in the National Contingency Plan as one of seven "special teams" available to the Federal On Scene Coordinator.
- SUPSALV's mission includes salvage, oil and hazardous substance response, ocean engineering, diving, and underwater "ship husbandry."
- On the West Coast, salvage and pollution control equipment under SUPSALV control can be found in Anchorage, Pearl Harbor, and Port Hueneme. Diving and underwater ship husbandry equipment is also available at Port Hueneme.
- SUPSALV equipment includes boom, recovery, pumping and storage systems, and field maintenance and communications support systems, and mobilization systems. Most SUPSALV boom is heavy-duty with deep-water mooring capacity. SUPSALV has 52,000 feet of 42" boom worldwide.
- Approximately 150 fulltime operators are also available, including 100 with spill response classification. Personnel can be doubled with subcontractors. SUPSALV operations from 1/97 to 1/99 included ten ship salvage operations.
- On-scene technical assistance is available from salvage engineers with experience in naval architecture, salvage operations and equipment, diving, and towing. They are available to advise the federal on-scene coordinator (FOSC), integrate into the ICS/UC structure, develop a salvage or lightering plan, or provide independent salvage analysis.
- SUPSALV spends \$300 to \$500 thousand annually on Research and Development. R&D projects focused on oil spill response includes projects focused on computer-aided plans, in-situ burning, and recovered oil logistics.
- Mr. Marcinkowski emphasized the importance of early contacts with SUPSALV for telephone consultation, but also to allow time to mobilize equipment and personnel. SUPSALV is tasked through the FOSC, but the FOSC and the Responsible Party's Incident Commander will negotiate whether to use SUPSALV or private equipment, and SUPSALV can provide the FOSC with an independent review of a private salvor's proposal. Mr. Marcinkowski acknowledged the federal mandate "not to compete" with the private sector. He noted, however, that to the extent any necessary response equipment was not available from the private sector in a timely fashion, as determined by the Federal OSC, then SUPSALV equipment could be used for a non-Navy spill.
- The SUPSALV national point of contact is William Healy at (703) 607-2758, extension 247. SUPSALV's contracted Operations Manager is Lloyd Saner, who can be reached at 757-887-7402. On the West Coast, contact Mike Pricola or Richard Brocchini at (805) 982-4463. The

general email address is 00cwebpollution@navsea.navy.mil and the SUPSALV website is www.navsea.navy.mil/sea00c

- A detailed SUPSALV inventory by site location can be accessed at www.essmwmbg.navy.mil/pollutio.htm

Gary Lillo, Data Manager, BP Exploration (Alaska), Inc.(BPXA)

- The Response™ software was originally designed in 1990 by Visual Information Systems in Anchorage for Alaska Clean Seas (ACS) as a tool to track oil spill response resources. After BPXA identified problems tracking resources during a 1993 drill, they adapted it for their needs, originally within the Logistics section of BP's incident Management Team. Since then the system has been acquired by numerous oil companies and during cooperative response scenarios the data contained in the system would be available for use by all parties.
- Response™ was enhanced over the next three years to incorporate lessons learned during drills. Additional input to the software refinement was received from Alyeska/SERVS, BP, Exxon, Mobil, Chevron, MSRC, and ACS. In its current form the Response™ software provides comprehensive personnel and equipment resource and cost tracking, and is integrated with a suite of standard ICS forms to provide output information which is used not only by logistics, but planning and operations sections as well. Business process development is underway within BP to perfect the use of this tool to produce the complete Incident Action Plan. While not designed as a financial control system, Response™ can provides estimated actual cost reports.
- Databases maintained in Response™ for BP include the RRI, State of Alaska fishing vessels, contingency plans for Prince William Sound and the North Slope of Alaska and Puget Sound as well as Washington State geographic response plans, detailed listings of response contractors, and major cooperatives. During a recent drill at ARCO's Cherry Point refinery BP used the system to generate detailed task force assignment (204's) that included local staging areas and access points, work descriptions, and resource requirements for 33 priority sites as specified by the San Juan Islands and North Puget Sound GRPs. BP has, over the past several years also developed specific logistical support modules and non-commercial response equipment component guides that have been loaded into the system for use to produce detailed equipment requirements covering everything from hot water maxi's to 500 man on-water berthing facilities to pre-defined staging and laydown areas. These modules and equipment component guides, when added to an approved task force/division etc., will actually produce the detailed vendor Purchase Orders necessary to acquire all the specified components needed to construct or deploy the specified item.
- To ensure data integrity BPXA subcontracts with E.A. Renfroe & Co to perform periodic database management, which includes OSRO equipment updates twice each year. As of February 2000 updated inventories maintained in Response™ include Alaska Clean Seas and SERVS in Alaska, Burrard Clean Operations in British Columbia, Clean Sound Cooperative in Puget Sound, MSRC, Clean Bay and Clean Coastal Waters in California, EARL in Singapore and Oil Spill Response Limited (OSRL) in Southampton.
- Response™ for BP is preloaded with an electronic version of the Shultz worldwide Oil Spill equipment catalog to provide information on alternative response equipment. This catalog is refreshed yearly.
- During discussion, Roy Robertson of Ecology noted that the ability of the Response™ software to complete the 215 form automatically could shortcut the necessary buy-in from participants in the planning section. Mr. Lillo acknowledged that all parties involved in an incident have a need to view displays of resource data and because of lessons learned from prior drills BP has now developed a business process which will route selected reports such as the 215 to print on large format plotter printers to enable the Planning resource tracking unit to prominently display the data without having to perform any manual data transfer or data creation.

- Furthermore, Mr. Robertson noted that the 204 form generated by the software can be too detailed. Mr. Lillo agreed that certain elements of the system program can be improved, but feels that these can easily be accomplished. The specific issue in prior drills having to do with too much paper could have been avoided by opting to print summary rather than detailed level reports. The system permits this as an option.

David Morris, President, Morris Environmental, Inc.

- In association with dbSoft, Inc. software developers, Morris Environmental licenses and implements *Incident Action Plan* software as one of their services.
- The IAP program can load personnel and site information in advance, produce ICS forms and automate information flow between ICS sections, allow simultaneous input from multiple users while managing data entry to avoid duplication, track resources and associated costs, and produce management reports.
- The response equipment/cost-tracking module lists response equipment in the US as well as worldwide, updated quarterly. Updates are either sent to licensed clients or made available to them on a private web site.
- Equipment data is provided by the OSROs and “quality control” is maintained through field experience and “word-of-mouth” within the industry.
- It allows the user to view information on available response equipment by location, supplier, and/or transit time. Mr. Morris demonstrated the program for San Francisco Bay, applying resource data to sensitive site information.
- A concern was raised as to whether coop equipment should be listed as available to any IAP software user, since coops reserve equipment for members’ use as required by their bylaws. Mr. Morris replied that this information is included in the inventory.

E. Response Equipment Mobility

(Discussion on this topic was structured around responses to specific questions posed by Mr. Zollitsch to the panelists, followed by comments and discussion among all Roundtable participants. Also included below are notes from conversations between Mr. Zollitsch and the panelists before the Roundtable.)

Q: What are the advantages of mobilizing spill response equipment for mutual aid?

- John Crawford responded that for response contractors like Foss Environmental, revenue is the primary reason to move equipment to a spill response, since that’s the reason they’re in business and they are not subsidized by members dues, as are the coops.
- Martyn Green also noted that revenue from equipment leasing can be reinvested to improve capability, as well as to offset coop members’ costs. He noted that members of his coop have invested in the equipment and would like to offset their costs with income from equipment leasing.
- Operational experience for response personnel is also valuable; this applies to experience with both using and moving the equipment. It also applies to experience with recovering different oil types and operating in different environments.
- Nevertheless, OSROs and coops must remain protective of their contracted customers. Steve Ricks responded that, although their response equipment is dedicated primarily to their members’ needs, coops on the West Coast do have mutual aid agreements. This not only provides additional spill response coverage, but the response experience is also valuable.
- Bill Rogers noted that, as a contingency plan-holder, Chevron is driven both by regulations and by company policies which stress their commitment to mitigate any spills for which they are responsible. Chevron is a member of every spill coop in the US as well as several abroad; this gives the company access to resources worldwide and allows them to choose among different types of response resources as appropriate for different types of environments.

- Delays in responding to spill events reflect badly on the oil industry as a whole, as well as on the response industry and the regulators. Effective response, including equipment mobilization between regions, is an incentive itself.
- Ike Ikerd of the Marine Spill Response Corporation (MSRC) commented that MSRC holds internal drills focused on equipment mobility. It was also noted that many coops share the same customers as MSRC, so they will try to keep equipment in reserve to support each other.
- CAPT Frank Whipple commented that 70 – 80% of any response is logistics, and time is the major restriction, especially when it comes to moving equipment between Alaska and the Lower 48. The Area Contingency Plans are critical.

Q: *What are the barriers and disadvantages to mobilizing spill response equipment for mutual aid?*

- Regulatory requirements for notification and regulatory restrictions on the movement of response equipment are perceived as barriers to equipment mobility. Jean Cameron noted the 1996 Mutual Aid Agreement among the Task Force member agencies and that fact that it establishes procedures for release of equipment for mutual aid.⁵ Industry is concerned that regulatory agencies would impose restrictions that would disrupt business.
- There are also private sector barriers; companies, which rely upon contracted equipment, must be notified, for instance. Reactions from such companies may vary, depending up whether they are small or large operations.
- It was stated that the Alaska Department of Environmental Conservation allows 60% of dedicated equipment to be moved for mutual aid. Larry Dietrick stated that DEC can allow all equipment to go out of state if needed, but beyond 60%, DEC is required by statute to place restrictions on activities of affected planholders for the purpose of spill prevention. Doug Lentsch noted that CISPRI and other Alaska coops are working with DEC to define exactly what types of equipment can be moved for mutual aid. It will be harder to allow release of “big ticket” items for movement to the Lower 48 than smaller, more common items.
- While Burrard Clean and Clean Sound Coop, Inc. have a mutual aid agreement in place, movement of Burrard Clean’s equipment beyond Puget Sound has not been addressed as yet. Coops and MSRC have their own restrictions of on equipment movement, as established in their bylaws. Coop bylaws usually require approval of by a Board of Directors for equipment release beyond the operating area, as well as signed contracts which include “hold harmless” requirements. Such restrictions may reflect state regulations. It was mentioned several times that it is difficult for coops to cover for each other since their client bases differ.
- There are many legal issues associated with borrowed equipment, particularly issues surrounding “hold harmless” sections of contracts, noted Doug Lentsch.
- As pre-staged response packages become more specialized to local areas, it becomes more difficult to mobilize that equipment. As Doug Lentsch noted, these packages are not intended to be moved away from an area of focus; they are “packaged” for use by a coop within its response zone, not for air shipment.
- Fuel, lubes, hydraulic oils, etc require special treatment during shipment.
- The lack of immediate access to commercial aircraft for shipping of equipment is a barrier. Standard shipping containers will not fit into military C130s.
- Operating environments must be taken into consideration, especially harsh environments like the Arctic.
- Legitimate concerns regarding damage/use of equipment loaned for mutual aid; such damage reduces the operating capacity...the “shelf life” of the equipment.

⁵ Copies of the States/BC Oil Spill Task Force 1996 Mutual Aid Agreement have subsequently been sent to Roundtable participants.

Q: *Other identified concerns/barriers?*

- When an RP's COFR is exceeded, an OSRO will be paid from the OPA 90 fund, but payments are slow in coming, so not all OSROs want this type of business.
- It has been noted in the PWS RCAC's study of this issue that West Coast supplies of boom and skimmers is adequate, but that primary storage capacity is low.
- Frank Marcinkowski noted that SUPSALV has equipment in strategic locations on the West Coast, and should be considered as available to "backfill" for private sector equipment moved out of an area.
- There are not enough dispersants stockpiled in any West Coast location to combat a Spill of National Significance.

Q: *Should OSROs and Coops establish their own mutual aid agreements?*

- Martyn Green noted that Burrard Clean has established a mutual aid agreement with Clean Sound and is drafting one with SEAPRO in SE Alaska. According to these "Best Effort Response" agreements, they would release up to 25% of their equipment immediately. They can go beyond that level, but would expect to maintain 33-50% as a minimum not to be released.
- The Association of Petroleum Industry Coop Managers (APICOM) has not really focused on this issue, i.e., eliminating liability concerns through advance planning. For the most part, cooperatives don't expect to mobilize equipment in the same way that for-profit responders do. Issues such as liability and compensation for equipment damages should be addressed in advance, however.
- It was stated that the liability is with the operators and that constraints are primarily imposed by the P&I clubs. It was also stated that P&I clubs recognize the critical importance of mounting an effective response during the first 12 hours of a spill, and are willing to pay for immediate response.
- Roland Miller noted that most OSROs have pre-drafted contracts to use for spill response services for non-members. Response Action contracts are not easily read and accepted during the hectic first hours of a spill, however.
- Steve Ricks commented that, since coops depend upon their members' dues, allowing a member to call upon any OSRO at the time of a spill undermines their financial base.
- "Regional Resource Manuals" in California have been used to pre-identify cascadable equipment.

E. Conclusions and Recommendations

INVENTORIES

Information on the US Coast Guard's Response Resource Inventory and the inventory of US Navy Supervisor of Salvage's spill response equipment is available to both Federal and State On Scene Coordinators, although only the FOSC can "activate" the SUPSALV equipment.

Several private sector equipment inventory systems are available. Some of these, like Response™ have been customized by industry users. Others, like the *Incident Action Plan* software developed by Morris Environmental, Inc. is available on a subscription basis to both private and public sector users. For salvage equipment, the primary salvage companies and the International Salvage Union serve as information resources.

Through the function of Unified Command in the Incident Command System for spill response, both the regulatory agency and responsible party participants bring information to the table that can be compiled and used cooperatively.

Several recommendations are offered here to promote continuous improvement of these existing response resource inventory systems:

- The USCG NFSCC should add an optional category to the RRI that would provide information on operational restrictions for listed equipment, for instance, information on oil types or operating

environment limitations. This information would aid in making decisions on what equipment to mobilize for the purpose of mutual aid.

- Both industry and agency planners should include access to equipment inventory information in drills/exercises in order to test the responsiveness of these existing systems as well as to train response personnel regarding use of inventory information.
- State and Federal agencies should collaborate in a review of equipment sited in West Coast Area Contingency Plans in order to determine whether the information is consistent with the RRI, whether USCG and SUPSALV equipment is included, and whether any regional gaps exist, as with recovered oil storage capacity or wildlife care, for example.

MOBILIZING SPILL RESPONSE EQUIPMENT FOR MUTUAL AID

The need to cascade response equipment for mutual aid is not as great as it once was, since most OSROs and coops have sufficient equipment on hand to exceed requirements. Three major OSRO types cover each West Coast Captain of the Port area: Foss Environmental, Clean “Something” Cooperative, and the Marine Spill Response Corporation. Moreover, coop equipment has been customized to meet local needs through the Geographic Response Plan/Strategy process utilized in most Area Plans. The need to cascade additional equipment into an area is most likely to result from one of two scenarios:

1. A specialized type of equipment is needed and unavailable locally; or
2. A worst-case scenario exceeds local response capacity.

Both OSROs and coops find value in mobilizing equipment for mutual aid, including income from equipment leasing and valuable experience in mobilization and use. Moreover, delays in responding to spill events reflect badly on the oil industry as well as on the response industry and the regulators. Effective and rapid response, including equipment mobilization between regions, is an incentive in and of itself. Steps can be taken, however, to facilitate equipment mobilization.

Recommendations regarding equipment information include:

- It was recommended that each OSRO – both the for-profits and the coops – pre-identify and list equipment available to be cascaded out of the region for mutual aid.
- Requests for mutual aid equipment need to be specific and need to include all support and ancillary equipment. Consider a list of “Action Items” to be considered when requesting equipment from another source, such as:
 - Method of shipment (air, vessel, highway, etc.)
 - Operating environment (request from coop with similar environment or specify special needs)
 - Request exemptions from regulatory agency controlling method of shipment
 - Access military aircraft through DOD representative to the RRT

Recommendations regarding drills and exercises include:

- Both agency and industry planners should include issues identified above in the design of drills and exercises. Regulatory agencies should use a planholder’s assigned resources during drills and exercises.

Recommendations regarding private sector arrangements include:

- Efforts should be made to standardize a Response Action Contract.
- APICOM is encouraged to address contracting terms and conditions for mutual aid among coops.
- Coops should look to their bylaws to identify barriers needing future resolution.

Recommendations to Federal and State regulatory agencies include:

- Task Force member agencies should meet with West Coast FOSCs to review the protocols in the Task Force’s 1996 Mutual Aid Agreement.

- Regulatory agencies should work with affected plan-holders to pre-identify possible operational restrictions which regulators might impose if response equipment is out of the operating area.
- If Canadian-owned or US-owned equipment were to be cascaded beyond Transboundary waters, there may be customs and immigration issues which need to be addressed consistent with arrangements between the US and Canada for response to a Transboundary spill event. These should be evaluated and addressed.
- In the event that coop or OSRO equipment is cascaded out of an area for the purpose of mutual aid, then the USCG Strike Team and SUPSALV equipment should be counted on for temporary back-fill/standby. State and USCG officials should meet to develop procedures and protocols to facilitate this process.

**Biographical and Contact information for
Response Readiness Roundtable panelists**

Todd Busch is Manager of Contracts and Emergency Services for Crowley Marine Services (CMS) with responsibilities for contract towing, project cargo moves, salvage, USCG emergency response BOAs, and SUPSALV. He also represents CMS interests as a Director on the Boards of both Marine Response Alliance and Clean Pacific Alliance. Todd has been with CMS since 1987, including service on Crowley Tugs for seven years. Todd can be contacted at:

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John Crawford is the Manager of contingency Planning and Compliance for Foss Maritime Company, headquartered in Seattle, WA. Before joining Foss in 1990, John served 28 years in the US Coast Guard. At Foss, his responsibilities for contingency plan development, training, and implementation have been honed through experience in the field as a HAZWOPER trained spill responder and supervisor. John has also served in a variety of ICS roles, for both Foss Environmental Services and Foss Maritime Company. John can be contacted at

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Martyn Green is President of Burrard Clean Operations, a Canadian Coast Guard certified response organization. Burrard Clean was originally established in 1976 by the oil industry to respond to marine petroleum spills in the Port of Vancouver, BC. It is now funded by its members to provide spill response to the entire West Coast of Canada. Martyn can be contacted at:

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Doug Lentsch has served as General Manager of Cook Inlet Spill Prevention and Response, Inc. (CISPRI) since 1995. Following graduation from Montana State University with a BS degree in geology, he completed nearly 25 years of service in the US Coast Guard. He was Chief of the Coast Guard's Pollution Response Branch in Washington DC at the time of the EXXON VALDEZ oil spill, and was deeply involved in the development and passage of the Oil Pollution Act of 1990. His office was subsequently involved in promulgation and implementation of the regulations regarding Area Contingency Plans, vessel and facility response plans, qualified individuals, the evolution of the current oil spill removal organizations, and the current structure of the National Strike Force and area Strike Teams. Doug can be reached at:

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