

Recommended State/Provincial efforts to Address Spills from Trucks

Offer technical assistance and work with trucking and insurance companies to address:

- Driver training - including their role w/re: to notifications
- The fact that it is critical to respond very quickly and with adequate resources - and that this will reduce overall costs
- The need for drills and exercises
- The availability of excellent resources at www.cpqi.ca <<http://www.cpqi.ca>>
- To identify OSROs and any other response resources available by geographic area

Work with OSROs and local responders:

- To address environmental aspects of various response strategies
- To identify OSROs and any other response resources available by geographic area

Work with other state/provincial agencies to address:

- Highway design for safety
- Placing response equipment and emergency call boxes - or mobile phone signal boosters - on remote highways, and/or restricting truck access to remote highways if other options exist
- Work with agencies that license drivers and give hazmat and tank endorsements to stress driver education on spill prevention, control, and response
- Work with agencies that license auto drivers to educate and test them on issues related to sharing the road with trucks (we encourage recreational boaters to learn to share the road with large ships - why not do the same for vehicle operators?)
- To identify OSROs and any other response resources available by geographic area

Other recommended initiatives:

- Require that OSROs be on contract and on standby during over-water truck to vessel transfers
- Identify whether local fire departments regulate truck-to-vessel transfers by port
- Clarify what port indemnity requirements are in place
- Either require drivers of tank trucks to have 24-hour hazwopper training, which brings the driver to a technician rating, thus allowing the driver to be a first responder and initiate containment and control - or petition federal authorities to do so
- Adopt a program like the Washington State Facility Personnel Oil Handling Training and Certification program (WAC 173-180 (c)) to train marine delivery truck drivers (available at <http://www.ecy.wa.gov/biblio/wac173180c.html>)
- Address the fact that US DOT regulations require that tank truck owners show financial responsibility of \$1 million on their insurance policies, but that these endorsements address upset and overturns yet exclude coverage for loading and unloading events. California has addressed this gap for trucks making over-water deliveries by requiring that such deliveries conform to the Lempert-Keene-Seastrand Oil Spill Prevention and Response Act. According to California regulations tank trucks are called Mobile Transfer Units (MTU's). If the MTU's are "transferring oil" over/around water the company is required to carry liability insurance. The amount of insurance is determined by multiplying the product volume, stated in barrels, by \$12,500 (the maximum per barrel clean-up and damage cost of spilled oil times thirty percent (30%) of the maximum cargo capacity. California regulations also require that an insurance policy include the language stated government code 8670; if the policy doesn't state the government code the company needs to sign the California Endorsement (copy attached).