NRC COVERED VESSELS

WASHINGTON STATE CONTINGENCY PLAN

JULY 2013

REVISED OCTOBER 2017

Binding Agreement Form

Washington State Department of Ecology
Spill Prevention, Preparedness and Response Program
P.O. Box 47600, Olympia, WA 98504-7600
For information, please contact SPPR Program at 360-407-7455.

Plan Holder/Company Name:

WAC 173-182-220: Binding Agreement
Each plan shall contain a written statement binding the plan holder to its use. The binding agreement shall be signed by the owner or operator, or a designee with authority to bind the owners and operators of the facility or vessel covered by the plan. The agreement is submitted with the plan.

Submitting Party Information

Company Name: NRC/NRCES	
Contact Name: Stephanie Barton	
Address: 9520 10th Ave South, Suite 150, Seattle, WA 98108	
Phone Number: 206-730-3993	**Fax #:** 206-607-3001
Email: sbarton@nrcc.com	**Website:** nrcc.com

Binding Agreement

I certify that I reviewed and am familiar with the information submitted in this Plan. I verify acceptance of the plan and commit to (a) a safe and immediate response to spills and to substantial threats of spills that occur in, or could impact Washington waters or Washington's natural, cultural and economic resources; (b) having an incident commander in the state within six hours after notification of a spill; (c) the implementation and use of the plan during a spill and substantial threat of a spill, and to the training of personnel to implement the plan; (d) the authority and capability to make the necessary and appropriate expenditures in order to implement plan provisions; (e) working in unified command within the incident command system to ensure that all personnel and equipment resources necessary to the response will be called out to clean up the spill safely and to the maximum extent practicable.

Stephanie Barton
Authorized Signature

July 15, 2013
Date

Stephanie Barton
Print Name

Director, Emergency Response Programs
Title

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

December 1, 2014

Stephanie Barton
NRC/NRCES
9520 10th Ave S, Suite 150
Seattle, WA 98108

Dear Ms. Barton:

I have reviewed the updates you sent to Ecology to satisfy the July 14, 2014, 18-month phase-in requirements for WAC 173-182. In addition to the formal review by Ecology, the updates have undergone two 30-day public review periods. Your plan updates meet all of the requirements of the rule and have been approved.

These are the second in a series of substantive updates required by the oil spill contingency plan rule. Ecology would like to thank you and our other industry partners for this considerable investment in oil spill preparedness. The State of Washington is now measurably better prepared because of your efforts.

These revisions have been added to our copies of your oil spill contingency plan residing at the Department of Ecology. If you have any questions regarding your oil spill contingency plan please contact Sean Orr via email at sorr461@ecy.wa.gov or at (360) 407-7420. Thank you again for submitting this plan update to Ecology. Your continued efforts at oil spill preparedness play a vital role in protecting Washington's marine environment.

Sincerely,

Linda Pilkey-Jarvis
Preparedness Section Manager
Spill Prevention, Preparedness and Response

cc: HQ Spills Central Files, Preparedness Section, NRC

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
PO Box 47600 • Olympia, WA 98504-7600 • 360-407-6000
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December 27, 2013

Stephanie Barton
NRC/NRCES
9520 10th Ave. S., Suite 150
Seattle, WA 98108

Dear Ms. Barton:

Congratulations, on behalf of the state of Washington I am granting final approval to the NRC/NRCES oil spill contingency plan. The plan meets Washington's statutory and regulatory requirements and must be maintained in an accurate condition. Please add a copy of the enclosed certificate to the front of each plan as proof of compliance. This approval expires on December 27, 2018.

Thank you for your cooperation and patience throughout the process. If you have questions, please contact your plan manager, Sean Orr at (260) 407-7420 or at sorr461@ecy.wa.gov.

Sincerely,

Linda Pilkey-Jarvis
Preparedness Section Manager
Spill Prevention, Preparedness, and Response

SO:jg

Enclosure: Certificate

cc: Sean Orr, Spills Program
USCG Sector Portland
Mike Zollitsch, Oregon DEQ
HQ Spills Central Files, Preparedness, NRC

Oil Spill Contingency Plan Approval Certificate

WASHINGTON STATE DEPARTMENT OF ECOLOGY

The Oil Spill Contingency Plan for

NRC/NRCES

has been APPROVED pursuant to Chapter 173-182 Washington Administrative Code by the

WASHINGTON STATE
DEPARTMENT OF ECOLOGY
Department of Ecology - Spill Preparedness Section

December 27, 2013
Date of Approval

Linda Pilkey-Jarvis
Preparedness Section Manager

December 27, 2018
Plan Expiration Date

PLAN DISTRIBUTION

An electronic copy of the NRC Plan is posted on the NRC Plan webpage on the NRC website (www.nrcc.com) providing immediate access to Covered Vessel owners, agents and demise charterers, all stakeholders, and the general public at the website.

RECIPIENT	# COPIES
Washington Department of Ecology	(1 Hardcopy)
Islands' Oil Spill Association	Electronic
O'Brien's Response Management	Electronic
Gallagher Marine Systems, Inc.	Electronic
Hudson Marine Management Services	Electronic
ECM Maritime Services, LLC	Electronic
Compliance Systems, Inc.	Electronic
Corbett & Holt	Electronic
Seacoast Maritime Services, LLC	Electronic
Patriot Maritime Compliance, LLC	Electronic
Meredith Management Group, Inc.	Electronic
iWorkWise - Plan Preparer	Electronic
E S & H Consulting & Training Group	Electronic
TBS Adjusting, Inc.	Electronic
Robert J. Meyers & Associates	Electronic
Norwegian Marine Services, Inc.	Electronic

Cross-Reference to Ecology Plan Requirements
(per WAC Cross Reference — 173-182 WAC)

Item	Section/Figure
SECTION A – General Planning, Information and Timing	
Plan Maintenance and reporting obligations (WAC 173-182-140, 245, 150)	
1. Plan review and update procedures: • Annual review – update and distribute amended pages to ecology, or send letter confirming existing plan is accurate. • Notify Ecology of significant changes 2. Post spill review and documentation: • Conduct post spill review procedures to confirm effectiveness of plan and make plan improvements	1.14 Front matter Front matter
SECTION B – Contingency Plan Format and Content	
Contingency plan format requirements (WAC 173-182-210)	
1. Formatted for maximum usefulness during a spill (includes job aids, diagrams, checklists)	X
2. Formatted with chapters, sections and annexes/appendices. Includes detailed TOC based on chapter, section, annex and titles, tables and figures.	X
3. Format allows replacement of revised pages.	X
Binding Agreement Statement (WAC 173-182-220)	
1. Name, address, phone number, email and website of submitting party 2. Verification of commitment to immediate response to spills. 3. Commit to having an Incident Commander in the state within 6 hours after notification of a spill. 4. Commit to implementation and use of plan during a spill and to training of personnel to implement plan. 5. Verify authority and capability of plan holder to make necessary and appropriate expenditures to implement plan provisions. 6. Commit to working in unified command within the incident command system.	Front matter
Contingency Plan General Content (WAC 173-182-230)	
Plan refers to and is consistent with the NWACP	1.2, throughout
States federal and state requirements intended to be met by plan.	1.7
Plan states size of worst case spill. • For vessel umbrella plans – a worst case volume for each port of operation may be submitted to ecology (if operations of enrolled vessels differ by port)	1.4
Revision Log to record revisions and updates (identify section amended, date of amendment, verification that ecology notified, person making change).	Front matter

Item	Section/Figure
Cross reference table reflecting locations in the plan of each component required.	Cross reference
Name, phone number, address, 24 hour contact number of PRC • Copy of mutual aid agreements and description of terms of that document. • Specify in writing if plan holder relies on a PRC or other contractor to staff ICS positions for spill management team.	App. A 3.2
Procedures to track and account for the entire volume of oil recovered and oily wastes generated and disposed of during spills.	Chapter 7
For vessels: • Name of each vessel covered under the plan • Name, address, location of the owner, • Official identification code or call sign • Country of registry • All ports of call or areas of expected operation in Washington waters • Type of oil by groups handled • Oil volume capacity by group • Description of operations covered by plan (include written, diagram indicating cargo fuel and ballast tanks and piping, power plants and other oil storage and transfer sites • Special exemption for vessel umbrella plans • Umbrella plans shall include a list of the types of vessels and the typical oil types by group and volumes • List all oils or products by name, include density, gravity, API, oil group number, sulfur content and ship capacity	1.3 1.3 1.3 Table 1-1 Table 1-2
Vessel diagrams indication cargo fuel an ballast tanks	1.3
Procedures to establish a process to manage oil spill liability claims	3.2, App. C
Supplemental Resources (WAC 173-182-232)	
Umbrella plans must provide documentation that authorizes the plan holder to activate supplemental response resources.	NA
Field Document (WAC 173-182-240)	
Field document listing time critical information for the initial emergency phase of the spill. • Make available to personnel who participate in oil handling operations • Keep at key locations at facilities, docks, on vessels, and in plan • List in plan locations where field documents are kept • Umbrella plans to include procedures to ensure each vessel covered by the plan is provided the field document prior to entering Washington waters. • Field document shall contain:	1.13, 2.2 App. C

Item	Section/Figure
• Procedures to detect, assess and document presence and size of spill • Spill notification procedures and call out list • Checklist identifying steps used to respond to a spill	
Emergency Response Towing Vessel (ERTV) (WAC 173-182-242)	
• Covered vessels that transit the Strait of Juan de Fuca must have contracted assess to the ERTV • Plan should detail information about the ERTV's capabilities and activation • Plan must commit to participating in drills that test compliance • Procedures for call out must be included in field document	App. E
Initial Response Actions (WAC 173-182-250)	
Initial Spill Action Forms	4.1, Fig. 2-2
Equipment to be used to conduct initial spill assessment – including equipment effective in darkness and low visibility (e.g. visual methods, tracking buoys, trajectory modeling, aerial overflights, thermal and infrared)	4.5
Safety Assessment (including initial air monitoring) for all types of spills, including spills to groundwater	4.3
Procedures to confirm the occurrence and estimate the quantity and nature of the spill, including updated reports.	4.5
Notification and call-out procedures (WAC 173-182-260)	
Procedures to immediately notify appropriate parties • Identify central reporting office or individuals responsible for implementing the notification procedure	2.1
List name and phone numbers of required notifications to government agencies, response contractors, spill management team members (internal call down information need not be included but should be available for review)	2.1.2
Identify clear order of priority for immediate notification.	Fig. 2-1
Vessel notification requirements (WAC 173-182-262)	
Covered vessels must notify the state through the WDEM of a discharge or substantial threat of a discharge.	2.2
Maintenance records for response equipment (WAC 173-182-270)	
Response equipment maintained in a state of readiness	5.5
Schedules, methods, and procedures for equipment maintenance. (maintenance records for at least 5 years available upon request	5.5
Spill Management Teams (WAC 173-182-280)	
Personnel available to manage oil spill (including contract personnel) • Organizational diagram for spill team for worst case spill	Fig 3-1

Item	Section/Figure
• Primary and alternate person to lead each ICS spill management position down to section chief and command staff level (made available to ecology upon request) • Written agreement with response contractors used to fill positions. • Job description for each spill management position (if consistent with NWACP may reference)	
Type and frequency of training for each position. (ICS, NWACP policies, use and location of GRPs, contents of plan, worker health and safety). Training program to include participation in announced and unannounced exercises).	Chapter 8 Fig 3-1
Covered vessels: primary and alternate incident commander's representative that can form unified command at the initial command post. Include estimated time frames for arrival of the remainder of the spill management team to the spill site or command post.	Sec 3 5.2
List process for orderly transitions of initial response staff to incoming local, regional, and away personnel, including transitions between shift changes.	3.2
Covered vessel umbrella plans: describe transition from umbrella plan to vessel owner.	N/A
SECTION C – Planning Standards	
Planning Standards (WAC 173-182-310)	
Ecology shall apply planning standard when determining ability of plan to meet regulations (to be verified at drills/spills). RP must address entire volume of actual spill regardless of planning standards. Planning standards do not constitute cleanup standards.	
Vessel of Opportunity planning standard (WAC 173-182-317)	
Covered vessel plan holders shall have contracted access to VOO in the regions they transit or operate.	Placeholder for July 2014
Covered vessel planning standards for aerial surveillance (WAC 173-182-321)(2)	
Plans must include logistical sources of additional resources not under contract.	5.3.2
Planning standards for group 5 oils (173-182-324)	
Plan holders must have a contract with a PRC that maintains resources to respond to group 5 oils.	5.3.3
Planning standards for dispersants (WAC 173-182-325)	
Vessels carrying group II or III persistent oil as primary cargo in any area where pre approval or case-by-case use of dispersants is available as per NWACP must plan for use of dispersants.	5.3.4
Identify locations of dispersant stockpiles capable of dispersing the lesser of 5% of worst case spill volume or 12,000 barrels/day using dispersant to oil ratio of 1:20.	5.3.4

Item	Section/Figure
Describe methods of transporting equipment and supplies to a staging area, and appropriate aircraft or vessels to apply the dispersant and monitor its effectiveness.	5.3.4
Describe operational support capability including the platforms and spotters to deploy dispersants, monitor the efficacy of application and ensure safety of response personnel.	5.3.4
Resources capable of being on scene within 12 hours of spill awareness.	5.3.4
Planning standards for in situ burning (WAC 173-182-330)	
For areas where in situ burning has an expedited approval process, provide plan for the use of in situ burning.	5.3.5
Identify the locations of two fire booms, air monitoring equipment, igniters and aircraft or vessels to be used to deploy the igniters.	5.3.5
Fire booms must be 500 ft in length each and have additional 1000 ft of conventional boom, tow bridles, and work boats capable of towing the boom for burning operations.	5.3.5
Describe methods of transporting the equipment to a staging area, and appropriate aircraft or vessels to monitor its effectiveness at the scene of an oil discharge.	5.3.5
Resources capable of being on scene within 12 hours of spill awareness.	5.3.5
Planning standards for storage (WAC 173-182-335)	
Identify both on-water devices and shoreside interim storage locations. For marine waters – shoreside storage can be identified to meet fifty percent of storage requirements in the planning standard tables, if the plan holders can demonstrate that recovered oil can be transported to the shoreside storage. For freshwater – shoreside storage to meet 65% of storage requirements if plan holder demonstrates that recovered oil can be transported to the shoreside storage. Covered vessel plan holders, at least twenty-five percent of the total worst case discharge volume at twenty-four hours, from the planning standard tables, must be dedicated to on-water storage.	5.3.6, App. B
Determining effectiveness of recovery systems (WAC 173-182-345)	
Plan holders and PRCs that own equipment must provide information to WDOE to determine the effectiveness of the recovery systems and how equipment meets planning standards.	5.4 App. A & E
Determining efficiency of recovery systems in various operating environments and product types: • For skimmers: Transport and deployment, list boom and workboats associated with each water based skimming system, identify pumps and pumping capacity to be used to transfer product to storage devices. • For oil recovery systems relying on vessel of opportunity or non-dedicated transport asset, include how asset would be located and secured. Include	5.4 App. A & E

Item	Section/Figure
mobilization time needed to ensure assets are available, as well as time needed to set up oil recovery system, and personnel.	
Determining effective daily recovery capacity (WAC 173-182-348)	
Plan holders and PRCs that own recovery equipment shall request EDRC (or alternative EDRC) using procedures and criteria in WAC 173-182-348 and 33 CFR 155, Appendix B, Section 6, Determining Effective Daily Recovery Capacity for Oil Recovery Devices.	5.4 App. A & E
For each skimming system, identify oil storage associated with each recovery system. State storage capacity integral to oil recovery system. Describe how recovered oil is to be transported to/from interim storage.	App. A, B & E
Documenting compliance with the planning standards (WAC 173-182-350)	
Provide spreadsheet on resources intended to meet planning standards. Account for boom, recovery systems, storage, and personnel by type, quantity, home base and provider. Include time for notification and mobilization of equipment and personnel (notification + mobilization + travel time = time to spill site). For dedicated resources owned by plan holder use mobilization planning factor = 30min. For all other dedicated response equipment use mobilization planning factor = 1 hour. Nondedicated resources: mobilization planning factor = 3 hours.	5.4, App. A & E
Equipment travel speeds computed using 35 mph for land and 5 kts for water.	5.2
Provide documentation (e.g. actual performance during spills or unannounced drills) to request approval for alternative notification, mobilization and travel times. Include date and time of performance or test, weather/sea state conditions and transportation information.	5.2
San Juan county planning standard (WAC 173-182-370) Padilla Bay planning standard (WAC 173-182-375) Commencement Bay – Quartermaster Harbor planning standard (WAC 173-182-380) Nisqually planning standard (WAC 173-182-385) Dungeness planning standard (WAC 173-182-390) Neah Bay Staging Area (WAC 173-182-395)	5.4, App. E

Item	Section/Figure
Copalis, Flattery Rocks, Quillayute Needles planning standard (WAC 173-182-400) Grays Harbor Planning Standard (WAC 173-182-405) Willapa Planning Standard (WAC 173-182-410) Washington Coast Planning Standard (WAC 173-182-450)	
SECTION D - Response and Protection Strategies for Sensitive Areas	
Response for response and protection strategies (WAC 173-182-510)	
Methods to track and contain spilled oil and enhance recovery and removal operations described in the plan	4.5
Describe how environmental protection will be achieved: • Protection of sensitive shoreline and island habitat by diverting or blocking oil movement • Description of sensitive areas and strategies to protect resources (including info on natural resources, coastal and aquatic habitat types and sensitivity by season, breeding sites, presence of state or federally endangered or threatened species, commercial and recreational species, geographic features, isolation areas beach types, geological characteristics • Identify public resources (public beaches, water intakes, drinking water supplies, marinas) • Identify shellfish resources and methods to protect • Identify significant economic resources to be protected in area covered by plan • For facilities with potential to impact “sole source” aquifer/public drinking water supply identify type of substrate and geologic extent of sensitive sites	6.1 - 6.4
Refer to NWACP for GRP’s developed to meet requirements. If approved GRPs do not exist in the NWACP, work with ecology to determine alternative sensitive areas to protect.	6.4
Identify potential initial command post locations	Table 3.2
Planning standards for shoreline cleanup (WAC 173-182-522)	
Each plan shall include procedures for identifying shoreline types that could be impacted by an oil spill and procedures to determine appropriate response tactics for the potentially impacted shorelines during spills. Plan holders must have contracted access to one hundred trained shoreline clean-up workers. The shoreline clean-up workers must have appropriate safety and Hazwoper training.	6.7 – 6.8 6.8 6.8

Item	Section/Figure
Plan holders must have contracted access to trained shoreline clean-up supervisors. Training for supervisors must include safety, Hazwoper, and relevant ICS courses. For planning purposes a ratio of 1:10 supervisors to clean-up workers should be available.	6.8
Plan holders shall have access to adequate equipment for passive recovery for three miles of shoreline on three tide lines. The plan must identify the staging location(s) of the shoreline clean-up equipment.	5.4
The plan holder must have access to a shoreline clean-up mobile storage cache that can support eighty to one hundred shoreline clean-up workers with personal protective equipment, hand tools, and other logistical support for three to five days.	5.12
Plan holders must describe how data collection, communications, data transmission and data management will be conducted.	5.12
The plan shall describe how the plan holder will obtain additional resources necessary to support fourteen additional days of shoreline cleanup. The description should include vendor names, contact information, resources, and approximate time frames for resources to arrive at a staging area.	5.12
Planning standards for wildlife rescue and rehabilitation (WAC 173-182-540)	
Identify applicable federal, state, and NWACP requirements for wildlife rescue and rehabilitation, and describe equipment, personnel, resource and strategies for compliance with the requirements. Resources are capable of arriving on scene within 24 hours of spill awareness.	6.6., 5.4
Drill and Equipment Verification Program	
Drill participation, scheduling and evaluation (WAC 173-182-700)	
Plan holders and primary response contractors shall participate in a drill and equipment verification program.	8.10, App. E

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ACRONYMS AND ABBREVIATIONS

Throughout the Plan, the following acronyms and abbreviations shall mean:

Covered Vessels	Vessels for which Owner, Operator, Demise Charterer or Agent has contract directly with NRC for NRC Plan coverage
DOT	Department of Transportation
Ecology	Washington State Department of Ecology
EDRC	Effective Daily Recovery Capacity
ERTV	Emergency Response Towing Vessel
FOSC	Federal On Scene Coordinator
FRV	Fast Response Vessels
GRP	Geographic Response Plan
HAZWOPER	Hazardous Waste Operations and Emergency Response
HB 1186	House Bill 1186
ICP	Incident Command Post
ICS	Incident Command System
IOC	NRC International Operations Center
IOSA	Island Oil Spill Association
NPREP	National Preparedness for Response Exercise Program
NRC	National Response Corporation and NRC Environmental Services Inc.
NRC Plan	NRC Covered Vessel Washington State Contingency Plan
NSF	National Strike Force
NWACP	Northwest Area Contingency Plan
OHMSETT	Oil and Hazardous Materials Simulated Environmental Test Tank
OPA'90	Oil Pollution Act of 1990
OSHA	Occupational Safety and Health Administration
OSRO	Oil Spill Removal/Response Organization
OSRV	Oil Spill Response Vessel
PPE	Personal Protective Equipment
PRC	Primary Response Contractor
RBS	Rotating Brush Skimmer
RP	Responsible Party
SMART	Special Monitoring of Applied Response Technologies
SOSC	State On-Scene Coordinator
SWB	Shallow Water Barge
USCG	United States Coast Guard
USFWS	U.S. Fish and Wildlife Service
VOO	Vessel of Opportunity
WAC	Washington Administrative Code
WCMRC	Western Canada Marine Response Corporation
WCS	Worst Case Spill
WEDM	Washington Emergency Management Division
WRRL	Western Response Resource List
WSFW	Washington State Fish and Wildlife

RECORD OF REVISIONS

UPDATING PROCEDURES: (see next page)

Change Number	Date of Amendment	Section Amended	Signature of Person Entering Change

UPDATING PROCEDURES

This Oil Spill Response Contingency Plan will be maintained and updated by:

NRC Environmental Services Inc.
9520 10th Avenue South, Suite 150
Seattle, WA 98108
Telephone: (206) 607-3000
FAX: (206) 607-3001
www.nrcc.com
Email: sbarton@nrcc.com

Corrections and suggestions, including constructive criticisms, are not only welcomed, but *encouraged*. Keeping this contingency plan current and useful is an ongoing process. Your assistance will be most appreciated.

This contingency plan will be reviewed and updated as needed to maintain the information contained herein as current as possible. Personnel assignments, names and telephone numbers will be reviewed and updated at least semi-annually. Plan reviews will be completed at least annually with follow-up letter to the Washington Department of Ecology. Plan reviews also follow actual spill response or tabletop exercises. Reviews post-spill response and post-exercise should identify specific required and recommended updates with an assigned responsible person and target date for revision.

Washington Department of Ecology must be notified within 24 hours of any significant changes that may affect its response capability. Written revisions for plan updates in such cases should be distributed within 30 days.

Updated materials will be distributed by a consecutively numbered LETTER OF TRANSMITTAL. Upon receipt of transmittal, take the following actions:

1. Remove / add pages, per instructions.
2. Record the change on the RECORD OF REVISIONS
3. File / retain the LETTER OF TRANSMITTAL immediately following this page.