

Washington Oil Spill Advisory Council

Policy Recommendations to Improve Capacity to Rapidly Respond to Large Oil Spills

Adopted April 2009

Based on Technical Study: *Assessment of Capacity in Washington State To Respond to Large-scale Marine Oil Spills*

1. Assure Capacity Exists to Effectively Respond to a Large Spill

It is currently beyond the regional capability to effectively respond in the critical first 48 hours to a catastrophic spill the size of the Exxon Valdez oil spill, which would be 257,000 barrels or over 10.7 million gallons. While a spill this size would be catastrophic, it is not the largest spill possible in Washington. It would be possible for there to be an instantaneous release spill of well over 800,000 barrels, over three times larger than the Exxon Valdez spill. We should recognize that such a spill would be devastating to our region for many years regardless of the level of response. Therefore, regulators should assure that exceptional precautions are in place for vessels capable of creating such a spill.

We should, however, make sure that contingency plan holders are adequately prepared to rapidly respond to large spills. Washington State has experienced numerous large spills in its transportation history and is likely to experience additional ones. The U.S. Coast Guard's measure of a maximum worst probable oil spill is ten percent of the possible worst-case oil spill. In Washington, oil vessels entering Puget Sound can be up to 125,000 dead weight tons and carry up to 833,333 barrels (35,000,000 gallons) of oil, with a maximum worst probable oil spill of 83,333 barrels (3,500,000 gallons). The technical study supporting these policy recommendations shows that Washington has substantial shortcomings to being able to respond to a spill of 50,000 barrels, let alone a spill of 83,333 barrels, within 72 hours. Achieving this capacity could be accomplished in Washington by following the recommendations below, taken as a whole.

2. Increase Response Capacity to Better Meet Public Expectations

The public expects sufficient oil spill response equipment and personnel to be available in a timely manner to respond to an oil spill as required by RCW 90.56.210(1)(b).

To achieve this, the following steps warrant particular consideration as possibilities to address, over time, this expectation:

- Additional dedicated oil storage devices for vessel skimmers that have little storage capacity would enhance on-water recovery capacity.
- Proven, state-of-the-art technologies as dedicated resources to improve on-water recovery on the outer coast's unprotected seas.

- Dedicated use of proven technologies capable of tracking and remotely sensing oil (ultraviolet spectrum analysis) and then automatically generating GIS/GPS maps would increase response feasibility in darkness and fog.
- Proven technologies for booming and skimming oil in high-current areas would increase capacity in high-current environments.
- Sufficient dedicated resources to assure that mechanical beach cleanup is possible if authorizing agencies allow mechanical recovery of oil from beaches to prevent oil from remobilizing.

Additionally, the report shows available time windows in which to conduct effective response activities off the outer coast of Washington. Response planning and adequate equipment caches should reflect that effective response is possible. This should include a greater number of GRPs developed for the outer coast.

3. Evaluate and Implement the Most Appropriate Method to Determine On-water Recovery System Capability

The Effective Daily Recovery Capacity method currently in use is outdated, insensitive to real-world factors, and overestimates recovery capacity. A more robust methodology that better models the capabilities of response systems, and is sensitive to real-world factors, such as ASTM F-1780-97 (2002), A Standard Guide for Estimating Oil Spill Recovery System Effectiveness, or other comparable methods should be used.

4. Enhance Oil Spill Drills done in Washington As they Pertain to Large-spill Response

Oil spill drills in Washington should be enhanced as follows to mitigate uncertainties regarding the availability of non-dedicated resources and trained personnel, and the ability to conduct concurrent on-water recovery operations and GRP deployments.

- a. Council's Presence in Drills: Immediately facilitate the presence of the Council or its successor at drills in which the Washington Department of Ecology Spills Program is involved.
- b. Deployment Drills; Size and Complexity: Design deployment drills to measure whether the equipment and personnel that contingency plans and paper-table top drills show to be available actually will be available and properly can be managed during spill response to a large oil spill.

The technical study and the adopted policy statements are posted to the Council's web site at http://governor.wa.gov/osac/assets/pdf/2009report_combined.pdf and http://www.governor.wa.gov/osac/assets/pdf/adopted_policies.pdf. Copies of both documents are available by contacting the Council.