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Review of Out-of-Region Equipment Resources Listed by Prince William Sound Planholders

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For:

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Contents

	Page
1. PURPOSE.....	3
2. PREVIOUS STUDIES	4
3. CONTRACTUAL RELATIONSHIP TO SERVS	5
4. CONTRACTUAL RELATIONSHIP TO OUT-OF-REGION EQUIPMENT PROVIDERS.....	6
4.1 PLANHOLDER CONTRACTUAL RELATIONS COMPARED TO PLOEN 2006 ANALYSIS.....	10
5. ANALYSIS OF EQUIPMENT TO OUTFIT 14 TASK FORCES	11
5.1 BOOMS.....	11
5.2 SKIMMERS.....	14
5.3 STORAGE UNITS	15
6. COMMENTS AND CONCLUSIONS	17
7. REFERENCES CITED	17
8. APPENDIX 1: RELATED INFORMATION FROM PLANHOLDER SUBMITTALS	18


REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

1. PURPOSE

Alaska statute AS 46.04.030 requires that crude oil tank vessels carrying more than 500,000 barrels (b) show equipment and other resources sufficient to contain or control, and cleanup a 300,000 b discharge within 72 hours. Additionally, the planholder shall maintain additional equipment, personnel and resources sufficient to contain, control and cleanup a maximum discharge within the shortest possible time.

In addition to 500 vessels (not included in this survey), out-of region equipment requirements have been defined by the Gilpatrick and Jones (1997) study for RCAC as needing 14 Task Forces having the following:

- 235,000 ft of boom, based on 6 shoreline protection task forces (120,000 ft) and 14 nearshore task forces (114,000 ft). Note that RCAC revised the previous quantity of 154,000 ft boom in ~2002.
- 84 skimmers.
- 168 storage devices (not counting secondary storage).

The purpose of this review is to:

1. Review contractual relationships between the planholder and SERVS.
2. Review contractual relationship(s) between the planholder and out-of-region equipment.
3. Analyze planholder submittals to verify that adequate resources are available and under contract to build 14 Nearshore Task Forces.

This report reviews the relevant portions of the following documents:

- Alaska Tanker Company, LLC. Integrated Vessel Response Plan, Contains two versions varying by section: Version 13, 1 July 2006, and Version 14, 1 April 2007.
- ConocoPhillips, ConocoPhillips Marine, Polar Tankers, Inc. Vessel Response Plan (VRP) and Shipboard Oil Pollution Emergency Plan (SOPEP), Revision 22 Review Copy, Volume I or II and II of II - Vessel & Shoreside Personnel, June 2007; and Digest of Volume I - Vessel & Shoreside Personnel, June 2007.
- SeaRiver Maritime Inc. Oil Discharge and Contingency Plan, Application Form for Approval dated 19 January 2007 comprising (a).Emergency Response Plan Core. Letter with revised copy dated 26 October 2006, and (b) Emergency Response Plan, Alaska State Appendix, Transmittal letter dated 19 January 2007.
- Tesoro, Tesoro Alaska Company. Prince William Sound Vessel Oil Discharge Prevention and Contingency Plan. Application Form for Approval dated 11 April 2007.



2. PREVIOUS STUDIES

PWS RCAC and the planholders have been concerned with this issue since the mid 1990's, and have issued several reports and reviews on the topic, including but not limited to the following:

- ! Gilpatrick and Jones (1997). Study for PWS RCAC: "Field Monitoring and Out-of-Region Equipment Survey", 27 pages. This report found that requirements for the 14 task forces were met in terms of skimmers and boom. However, there was a shortfall in storage capacity (deficit of 35 units overall, but deficit of 88 units at 95 bbl and above).
- ! Gundlach and Reiter (2001). "Out-of-Region Equipment Survey", 77 pages. For PWS RCAC this report updated the 1997 report for equipment, showing a substantial increase in most equipment categories. If all listed government and planholder sources were considered, there was sufficient equipment to outfit 14 Task Forces. However equipment shortfalls exist if only those sources designated by the planholder and readily releasable were included. During major emergencies it would be expected that several sources would be able to release more equipment than was listed at the time (so again the 14 task force requirement would be met). A critical problem was that the planholder's did not (a) clearly identify their sources of equipment, (b) identify their contractual agreements for equipment, and (c) describe what equipment was being considered in response to the State of Alaska requirement.
- ! Ploen and Maunder (2002). "Out-of-Region Response Equipment Survey, June 2002", 78 pages. For the planholders, this report considered private and government (U.S. Coast Guard, U.S. Navy SUPSALV). It also identified several other out-of-region equipment surveys that they had available to them (1995 SeaRiver Maritime, Inc. Survey; 1995 ARC0 Marine Inc. Survey, and 1997 U.S. Coast Guard Survey). Comparisons to actual major oil spills were provided to illustrate the ability to bring in large amounts of equipment as needed. The study found that the 14 task forces would be appropriately outfitted.
- ! Gundlach (2002). "Review of: Out-of-Region Response Equipment Survey (June 2002), prepared by Mark Ploen and Susan Maunder". For PWS RCAC this report reviewed the above planholder report and provided updated quantities available. As noted in the 2001 survey for RCAC, planholders do not clearly identify their sources for response equipment. For example, Ploen and Maunder (2002) show that the planholders identified 21 response organizations, but using planholder documentation, Gundlach (2002) found only 13 organizations were submitted to ADEC. There was agreement between the reports that the equipment requirement of 14 task forces was met.
- ! Ploen (2006). "Out-of-Region Response Equipment Acquisition Survey, June 2006", 31 pages. For the planholders, the Ploen and Maunder (2002) report was updated with responses to new questionnaires. A new section of Best Available Technology (BAT) was added as related to equipment. Summary data tables indicate that sufficient equipment would be available.


REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

In this report, the results of Ploen (2006) are analyzed in further detail using the submittals of the planholders.

3. **CONTRACTUAL RELATIONSHIP TO SERVS**

Table 1 indicates the relationship between the planholder and Alyeska Pipeline Service Company (APSC) / Ship Escort Response Vessel System (SERVS).

Results show that all planholders have a contract with APSC for oil response services. All four planholders show the signed contract.

Table 1. Relation between Planholders and SERVS, as Derived from Planholder Submittal.	
Company	Relation / Source Document
Alaska Tanker Company, LLC	Under contract. In A8.2 Contracted Resources, the plan provides a letter from Alyeska Pipeline Service Company confirming to BP Shipping that the following Alaska Tanker Company vessels are covered under the "Agreement for Oil Spill Response Services": <i>Denali, Kenai, Prince William Sound, Tonsina, Marine Columbia, Overseas Chicago, Overseas New York, Overseas Washington, Alaska Frontier, Alaska Legend, and Alaska Navigator.</i>
ConocoPhillips ConocoPhillips Marine Polar Tankers, Inc.	Under Contract. In Section 7.2 Sources for Immediate Support, the plan lists SERVS as under a contract with ConocoPhillips or ConocoPhillips subsidiaries. Appendix C, page C10 contains verification by SERVS, dated 30 January 2001. Polar Tankers Spill Response Company is listed as PRAC for Polar Tankers at bottom of Figure 7.1
SeaRiver Maritime	Under Contract. First, second, and signed last page of contract TAPS/6680 between SeaRiver Maritime, Inc. and Alyeska Pipeline Service Company is provided (dated 1 July 1999).
Tesoro Alaska Company	Under contract. In Appendix B Contracts, the plan provides a letter (12 Oct 2001) from Alyeska Pipeline Service Company confirming to Tesoro Maritime Shipping that the following tank vessels are covered under agreement: Seabulk Arctic, Seabulk Pride, Seabulk Mariner, and Captain H.A. Downing.


REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT
4. CONTRACTUAL RELATIONSHIP TO OUT-OF-REGION EQUIPMENT PROVIDERS

Table 2 indicates the relationship between the planholder and potential out-of-region equipment suppliers. For reference, the out-of-region equipment portions of each response plan are

excerpted in Appendix 1. Results indicate that out-of-region equipment as defined by the planholders remains extremely unclear. This was the same problem identified in previous submissions (see 2001 and 2002 RCAC reports).

Alaska Tanker Company provides a figure listing some sources that are likely to be under contract but no certificates of membership. Alaska Tanker Company also lists numerous providers as accessible via APICOM (Association of Petroleum Industry Co-Op Managers). A copy of the Mutual Aid and Assistance, Memorandum of Understanding is provided in Table 3, indicating that equipment may be obtained using this membership, with the clear notation that *"there is no obligation to request or to provide assistance."*

ConocoPhillips provides good supporting information, providing a copy of the agreements in their Appendix C.

SeaRiver Maritime provides a long list of equipment providers, running from the verifiable because they provide a certificate of membership, likely to be verifiable as through cooperative agreement with SERVS, and accessible via APICOM.

Tesoro shows only membership in MSRC.

Table 2. Relation between Planholders and Out-of-Region Equipment Suppliers Derived from Planholder Submittals. See Appendix 1 for Related Source Documents from Each Response Plan.	
Company	Relation / Source Document
Alaska Tanker Company, LLC	<p><i>Under Likely Agreement, either Direct or through SERVS Membership.</i> No supporting material provided except in diagram in Figure A8.15 for the following which are listed as available via BP Oil Shipping Company as PRAC:</p> <ul style="list-style-type: none"> Alaska Clean Seas Burrard Clean Clean Caribbean Cooperative Cook Inlet Spill Response Inc. East Asia Response Limited Marine Spill Response Corp. National Response Corporation



REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

	<p>Oil Spill Response Limited</p> <p>Inclusion via APICOM. The diagram in Figure A8.15 indicates that all parties in the APICOM (Association for Industry Cooperative Managers) are, by their membership, part of a giant spill response cooperative. As noted in the APICOM MOU in Table 3, this membership does not guarantee the delivery of out-of-region equipment.</p> <p>Sources listed include the following (eliminating duplications previously listed above):</p> <ul style="list-style-type: none"> Alaska Chadux Corp. Clean Channel Association. Clean Gulf Associates Clean Harbors Cooperative Clean Islands Council Delaware Bay & River Cooperative, Inc. SeaPro
<p>ConocoPhillips ConocoPhillips Marine Polar Tankers, Inc.</p>	<p>Under Verifiable Agreement: The following are listed in Figure 7.1: MSRC and OSRL. The following oil spill response organizations (OSROs) are listed on page 7-1 as under contract to ConocoPhillips or a subsidiary and able to provide equipment. Copies of Agreement or Certificate is provided in Appendix C for the following:</p> <ul style="list-style-type: none"> Clean Caribbean (<i>also accessible via agreement with OSRL</i>). Clean Islands Council NRC Environmental Services (formerly Foss). MSRC OSRL
<p>SeaRiver Maritime</p>	<p>Under Verifiable Contract: Clean Bay, Clean Seas, Clean Coastal Waters, MSRC and OSRL.</p> <p>Under Direct Contract (Certificate or letter provided (Section AK-300):</p> <ul style="list-style-type: none"> Clean Bay (CA), Clean Seas (CA), Clean Coastal Waters (CA) <p>Agreement between ExxonMobil and SeaRiver Maritime that ExxonMobil would provide response, crisis management and emergency services (Section AK-300). Certificate provided in AK-300 that ExxonMobil is a registered PRAC (Primary Response Action Contractor). Expired in May 2007.</p>



REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

	<p>Agreements with ExxonMobil subsidiary:</p> <p>MSRC - Service Agreement provided between ExxonMobil Refining and Supply Company and MSRC (Section AK-300), signed by ExxonMobil Shipping.</p> <p>OSRL - 1991 agreement between Oil Spill Response Limited and Esso Europe Africa Services Inc.</p>
<p>SeaRiver Maritime (Cont.)</p>	<p><i>Under Likely Agreement with Contracted Party.</i> No documentation of these secondary agreements is provided. Diagram in AK-300 provides a list. Assumptions as to secondary agreements listed below are based on 2002 (Gundlach) RCAC study and updated OSRL information.</p> <p>With SERVS:</p> <ul style="list-style-type: none"> Alaska Clean Seas Cook Inlet Spill Prevention and Response Inc. Crowley Maritime <p>With OSRL:</p> <ul style="list-style-type: none"> East Asia Response Ltd. (EARL) Clean Caribbean Cooperative (CCC) <p>Others in diagram in AK-300). <i>Note: this is obviously not updated since Foss Environmental is no longer operating as Foss Environmental.</i></p> <ul style="list-style-type: none"> Burrard Clean Foss Environmental National Response Corporation (NRC).
<p>SeaRiver Maritime (Cont.)</p>	<p><i>Inclusion via APICOM.</i> The diagram in Section AK-300 indicates that all parties in the APICOM (Association for Industry Cooperative Managers) are, by their membership, part of a giant spill response cooperative. However, as shown in the APICOM MOU in Table 3, this membership does not guarantee the delivery of out-of-region equipment.</p> <p>Sources listed include the following (eliminating duplications previously listed above):</p> <ul style="list-style-type: none"> Alaska Chadux Corp. Clean Channel Association. Clean Gulf Associates Clean Harbors Cooperative Clean Islands Council Delaware Bay & River Cooperative, Inc.



REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

	SeaPro
Tesoro Alaska Company	<p>Under Contract: MSRC. In Appendix B Contracts, agreement for oil spill response services is listed between Tesoro Alaska Petroleum Company and Seabulk International (formerly Hvide Marine Incorporated).</p> <p>MSRC "Membership Agreement" shown in Appendix B (1 April 2001) between Seabulk International and Marine Preservation Association (MSRC), signed by President of Hvide Marine Inc.</p>

Table 3. Association of Petroleum Industry Co-op Managers, Mutual Aid and Assistance, Memorandum of Understanding Between Independent Oil Spill Response Cooperatives

Members listed (www.APICOM.org, July2007) include: Alaska Chadux, Alaska Clean Seas, Australian Marine Oil Spill Centre, Burrard Clean, CISPRI, Clean Caribbean, Clean Channel, Clean Gulf, Clean Harbors, Clean Islands, Clean Rivers, Clean Seas, Corpus Christi Area Oil Spill Control Association, Delaware Bay & River Coop, Eastern Canada Response Corp., Guam Response Services, Loop, LLC, Mackensie Delta Spill Response Corp., MSRC (Eastern, Southern, Northwest, and West Coast regions), OSRL-EARL, Savannah Spill Response Corp, SEAPRO, SERVS-Alyeska Pipeline.

PURPOSE: The purpose of this Memorandum of Understanding (MOU) is to acknowledge the benefits of mutual aid and assistance and establish procedures among individual Association of Petroleum Industry Co-op Managers (APICOM) cooperatives to coordinate requests for assistance.

BACKGROUND: APICOM serves as a forum for the exchange of information and ideas related to oil spill response technologies, operations, regulations and other issues of common concern to its individual members. APICOM may also act collectively to address issues of common interest. In the event of a catastrophic oil spill, it is possible that oil spill response equipment, materials, personnel and expertise may be required from outside the immediate spill area as a means of bringing more resources to bear to combat the spill. APICOM members are well positioned to help satisfy this requirement by providing aid and assistance from their respective cooperatives. This MOU serves as a vehicle for facilitating that aid and assistance.

PROCEDURES: As caretakers and managers for a number of extensive stockpiles and response organizations, the signatories to this MOU agree to consider a request for aid and assistance from another signatory cooperative. Aid and assistance may be provided in the form of equipment, materials, chemicals, personnel, technical or any other assistance or information that can be made available to the requesting cooperative. Parties to this MOU have no obligation to request assistance or to provide assistance. Any assistance rendered shall be mutually agreed upon and guided by the assisting cooperative's terms and conditions through its standard contractual agreements, consistent with by-laws, and any federal, state or local laws and regulations.

To facilitate providing aid and assistance, the signatories to this MOU agree to:

- A. On an annual basis exchange lists of potentially available equipment.
- B. Provide all signatories with updated emergency contact information.
- C. Upon receipt of a request for aid and assistance, respond by providing the requesting cooperative with a list of equipment, personnel or other assistance available to the requesting cooperative, as well as the terms and conditions for their release.

In witness whereof, the undersigned have agreed to this Memorandum of Understanding effective as of the date of


REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

execution.

4.1 Planholder Contractual Relations Compared to Ploen 2006 Analysis.

Table 4 compares planholder 2007 submittals (as per Table 2) to the Ploen 2006 report prepared for the planholders.

Results indicate that the Ploen (2006) report considers contractual or other relationships that are not provided in the planholder submittals. This is particularly clear in the review of Polar Tankers and Tesoro.

Table 4. Response Organizations Listed in Planholder Submittals Compared to Those Listed in the Ploen (2006) Equipment Survey Report Performed for the Planholders.

	From Planholders 2007 Submissions				From Ploen 2006 Equipment Survey Report			
	AlaskaTank.	Polar Tank.	SR/M	Tesoro	AlaskaTank.	Polar Tank.	SR/M	Tesoro
Alaska Chadux	APICOM Fig A8.15		APICOM Fig A8.15		X6	X6	X6	X6
Alaska Clean Seas	Fig. A8.15		Table AK-302.1		X1	X6	X2	X6
Burrard Clean	Fig. A8.15		Table AK-302.1		X1	X	X	X6
Clean Bay			Certified AK-300		-	-	-	-
Clean Caribbean	Fig. A8.15	P. 7.1+App.C	Table AK-302.1		X1	X2,6	X3	X6
Clean Channel	APICOM Fig A8.15		APICOM Fig A8.15		-	-	-	-
Clean Coastal Waters			Certified AK-300		-	-	-	-
Clean Gulf Assoc.	APICOM Fig A8.15		APICOM Fig A8.15		X6	X2,6	X3	X6
Clean Harbors	APICOM Fig A8.15		APICOM Fig A8.15		-	-	-	-
Clean Islands Council	APICOM Fig A8.15	P. 7.1+App.C	APICOM Fig A8.15		X6	X	X	X6
Clean Rivers Coop.					X6	X	X6	X6
Clean Seas			Certified AK-300		X6	X6	X3,6	-
Clean Sound					-	-	-	-
CISPRI	Fig. A8.15		Table AK-302.1		X1,6	X2,6	X5	X
Crowley Maritime			Table AK-302.1		X4	X4,9	X4	X4
Delaware Bay & River	APICOM Fig A8.15		APICOM Fig A8.15		X6	X6	X6	X6
EARL	Fig. A8.15		Table AK-302.1		X1	X6,8	X3	X
Foss NRC Environmental		P. 7.1+App.C	Table AK-302.1		NRCES	NRCES	NRCES	NRCES
Marine Pollution Control			Table 405.7		-	X9	-	-
MSRC	Fig. A8.15	P. 7.1+App.C	Certified AK-300	App. B	X1	X2	X3	X
NRC (National Resp. Corp.)	Fig. A8.15		Table AK-302.1		X1	-	-	-
OSRL	Fig. A8.15	P. 7.1+App.C	Certified AK-300		X1	X	X3	-
Quali Tech					-	-	-	-
SEAPRO	APICOM Fig A8.15	Digest p.2-15			X6	X6	X6	X6
Southern Waste Services					-	-	X	-
Unitech of Alaska		Digest p.2-15			-	-	-	-
USCG Alaska	Fig. A8.15		Table AK-302.1		-	-	-	-
USCG Out of Alaska	Fig. A8.15		Table AK-302.1		-	-	-	-
SUPSALV Anchorage	Fig. A8.15		Table AK-302.1		-	-	-	-
SUPSALV elsewhere	Fig. A8.15		Table AK-302.1		-	-	-	-

*Foss is listed as Foss Environmental in Ploen (2006).
Polar Tankers lists it correctly and NRC Environmental Services.
USCG and SUPSALV listed as "Other Equipment Providers".

-=no relation indicated, X=formal relation, X1=via BP.
X2=ConocoPhillips/subsidiaries, X3=ExxonMobil/subsidiaries.
X4=via APSC-SERVS and Crowley
X6=APICOM membership provides access to equipment.
X7=Clean Sound membership provides access to equipment.
NRC=Foss now is NRC Environmental Services.



5. ANALYSIS OF EQUIPMENT TO OUTFIT 14 TASK FORCES

This part of the review analyzes the planholder submittals with regards to outfitting 14 Task Forces having the following equipment resources:

- 235,000 ft of boom, based on 6 shoreline protection task forces (120,000 ft) and 14 nearshore task forces (114,000 ft).
- 84 skimmers
- 168 storage devices (not counting secondary storage)

The sources of the out-of-region equipment are those identified by each planholder, including government stocks. APICOM equipment is separately categorized because (1) it is not totally available (that is the cooperative will always maintain some equipment for local response, and (2) there is often Coast Guard or other governmental approvals for its release to Alaska. That being said, much of the equipment would be expected to be released in an emergency situation, and

there are additional APICOM cooperatives that are not included in the planholder submittals that would likely be able to provide equipment as well (compare the list of APICOM members in Table 3 to those listed by the planholders in Table 2 and Table 4).

The source data for the equipment stock is from the Ploen (2006) survey of available equipment.

5.1 Booms

Table 5 provides a listing of the boom available as provided by the Ploen (2006). Table 6 shows boom available as listed in the planholder's response plan.

Results show that there is sufficient boom (excluding APICOM and government sources) for all planholders except Tesoro, which only lists MSRC in their plan. By including government

sources, all planholders meet the 235,000 ft boom requirement. Government sources alone show more than 235,000 ft available, such that the planholders by including this equipment would then not require contracted boom. This issue of using

government equipment as part of their out-of-region equipment supplies was identified in the 2001 RCAC study as well.



REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

Table 5. Boom by Type in Feet (modified from Ploen, 2006).

<i>Organization</i>	8-18 inch	18-42 inch	>42 inch	Shoreseal	Fireboom	Total
Alaska Chadux	0	43870	4100	0	0	47,970
Alaska Clean Seas	214,550	48,211	12,299	19,400	19,064	313,524
Burrard Clean	0	15,000	0	0	500	15,500
Clean Bay	nd	nd	nd	nd	nd	nd
Clean Caribbean Coop.	nd	nd	nd	nd	nd	nd
Clean Channel	nd	nd	nd	nd	nd	nd
Clean Coastal Waters	nd	nd	nd	nd	nd	nd
Clean Gulf Assoc.	0	0	0	0	0	0
Clean Harbors	nd	nd	nd	nd	nd	nd
Clean Islands Council	0	2,000	0	0	0	2,000
Clean Rivers Coop.	5,000	10,300	0	0	0	15,300
Clean Seas	0	0	0	0	0	0
Clean Sound	nd	nd	nd	nd	nd	nd
CISPRI	11,920	32,730	30,650	0	6,000	81,300
Crowley Maritime	nd	nd	nd	nd	nd	nd
Delaware Bay & River	0	10,000	0	1,000	0	11,000
EARL	2,170	18,445	9,176	0	0	29,791
Foss Environment	104,150	13,500	0	0	0	117,650
MSRC	59,000	14,700	11,850	0	0	85,550
National Response Corp.	400	123,199	100,030	0	0	223,629
OSRL	18,930	0	15,000	4,060	0	37,990
Quali Tech	0	20,000	2,000	0	0	22,000
SEAPRO	37,160	900	0	1,000	0	39,060
Southern Waste Services	131,000	20,000	0	0	0	151,000
Unitech of Alaska	8,000	0	0	0	0	8,000
USCG Alaska	150,000	120,000	5,000	0	0	275,000
USCG Out of Alaska	0		19,680	0	0	19,680
SUPSALV Anchorage	11,900	12,800	3,600	0	0	28,300
SUPSALV elsewhere	0	0	40,000	0	350	40,350
Total	754,180	505,655	253,385	25,460	25,914	1,564,594

nd = no data provided by Ploen
(2006).



REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

Table 6. Boom Quantity as Listed by Planholder using Ploen (2006) Data.

Boom in Feet	Total	Alaska Tanker		Polar Tank.	SR/M		Tesoro
Organization	Feet	In Plan	APICOM	In Plan	In Plan	APICOM	In Plan
Alaska Chadux	47,970		47,970			47,970	
Alaska Clean Seas	313,524	313,524			313,524		
Burrard Clean	15,500	15,500			15,500		
Clean Bay	nd				nd		
Clean Caribbean Coop.	nd	nd		nd	nd		
Clean Channel	nd		nd			nd	
Clean Coastal Waters	nd				nd		
Clean Gulf Assoc.	0					0	
Clean Harbors	nd		nd			nd	
Clean Islands Council	2,000		2,000	2,000		2,000	
Clean Rivers Coop.	15,300						
Clean Seas	0				0		
Clean Sound	nd						
CISPRI	81,300	81,300				81,300	
Crowley Maritime	nd					nd	
Delaware Bay & River	11,000		11,000			11,000	
EARL	29,791	29,791			29,791		
Foss NRC Environmental	117,650			117,650	117,650		
MSRC	85,550	85,550		85,550	85,550		85,550
National Response Corp.	223,629	223,629			223,629		
OSRL	37,990	37,990		37,990	37,990		
Quali Tech	22,000						
SEAPRO	39,060		39,060	39,060			
Southern Waste Services	151,000						
Unitech of Alaska	8,000			8,000			
Subtotal	1,201,264	787,284	100,030	290,250	904,934	60,970	85,550
Grand Total	1,201,264		887,314	290,250		965,904	85,550

USCG Alaska	275,000
USCG Out of Alaska	19,680
SUPSALV Anchorage	28,300
SUPSALV elsewhere	40,350
Total Govt Sources	363,330
Total 14 Task Forces	235,000

nd = no data provided in Ploen

(2006)

Foss is listed as Foss Environmental in Ploen (2006).

Polar Tankers lists it correctly as NRC Environmental

Services.

USCG and SUPSALV listed as "Other Equipment Providers".



REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

5.2 Skimmers

Table 7 presents the tally of skimmer quantity and capacity from Ploen (2006) using the planholder submittals to identify the response organization. A total of 84 skimmers need to be provided to outfit the 14 Task Forces.

Results indicate that all planholders except Tesoro are able to form the 14 Task Forces with equipment from identified sources. According to the Tesoro submittal, only MSRC is identified as a source. If government sources are included (101) skimmers, then Tesoro also meets the requirement.

As with booms, government sources alone meet the requirement.

Table 7. Skimmer Quantity and Capacity as Listed by Planholder using Ploen (2006) Data.

Skimmer Number and Capacity (bbl)			AlaskaTanker				Polar Tankers		SR/M				Tesoro	
	No.	Capacity	In Plan		APICOM		In Plan		In Plan		APICOM		In Plan	
Organization	No.	Capacity	No.	Cap.	No.	Cap.	No.	Cap.	No.	Cap.	No.	Cap.	No.	Cap.
Alaska Chadux	31	33675			31	33,675			31	33,675				
Alaska Clean Seas	186	227,499	186	227,499					186	227,499				
Burrard Clean	3	2,415	3	2,415					3	2,415				
Clean Bay	11	16,455							11	16,455				
Clean Caribbean Coop.	2	2,742	2	2,742					2	2,742				
Clean Channel	nd	nd			nd	nd					nd	nd		
Clean Coastal Waters	5	140	5	140					5	140				
Clean Gulf Assoc.	2	nd									2	nd		
Clean Islands Council	1	1,961			1	1,961	1	1,961			1	1,961		
Clean Rivers Coop.	37	82,681												
Clean Seas	14	nd							14	nd				
Clean Sound	23	58,639												
CISPRI	48	77,707	48	77,707					48	77,707				
Crowley Maritime	0	0							0	0				
Delaware Bay & River	2	3,715			2	3,715			2	3,715				
EARL	35	97,999	35	97,999					35	97,999				
Foss NRC Environmental	61	76,976			61	76,976			61	76,976				
Marine Pollution Control	20	30,120							20	30,120				
MSRC	48	210,110	48	210,110			48	210,110	48	210,110			48	210,110
National Response Corp.	188	5,034,656	188	5,034,656					188	5,034,656				
OSRL	94	182,966	94	182,966			94	182,966	94	182,966				
Quali Tech	14	29,293												
SEAPRO	18	48,043			18	48,043	18	48,043						
Southern Waste Services	39	19,285												
Unitech of Alaska	4	232					4	232						
Subtotal	886	6,237,309	609	5,836,234	113	164,370	165	443,312	748	5,997,175	3	1,961	48	210,110
Grandtotal					722	6,000,604	165	443,312			751	5,999,136	48	210,110

USCG Alaska	6	4,457
USCG Out of Alaska	50	150,850
SUPSALV Anchorage	20	14,810
SUPSALV elsewhere	25	34,824
Total Government	101	204,941

nd = no data provide by Ploen, 2006.

*Foss is listed as Foss Environmental in Ploen (2006).

Polar Tankers lists it correctly as NRC Environmental Services.



REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

5.3 Storage Units

Storage units are given in terms of capacity and number in Table 8. A total of 168 are needed to outfit 14 Task Forces.

Table 9 provides the number of storage units by planholder. Results indicate that Tesoro does not list sources for the required 168 storage units, even when 117 units from government sources are included. Polar Tankers meets the requirement when

government sources are included.

Table 8. Storage Units by Size and Number (from Ploen, 2006).

Storage Number / Capacity	<49 bbl		50 to 94 bbl		95 to 250		251 to 500		>500 bbl		Total	
	No.	Cap.	No.	Cap.	No.	Cap.	No.	Cap.	No.	Cap.	No.	Cap.
Alaska Chadux	0	0	31	2171	0	0	0	0	0	0	31	2,171
Alaska Clean Seas	198	8,131	42	2,670	21	4,499	0	0	0	0	261	15,300
Burrard Clean	0	0	0	0	0	0	0	0	0	0	0	0
Clean Bay	0	0	6	360	6	600	0	0	0	0	12	960
Clean Caribbean Coop.	0	0	0	0	0	0	12	3,600	0	0	12	3,600
Clean Channel	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
Clean Coastal Waters	5	140	0	0	0	0	0	0	0	0	5	140
Clean Gulf Assoc.	0	0	0	0	0	0	0	0	0	0	0	0
Clean Harbors	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd	nd
Clean Islands Council	0	0	0	0	0	0	1	300	0	0	1	300
Clean Rivers Coop.	0	0	2	120	11	1,100	0	0	0	0	13	1,220
Clean Seas	2	56	0	0	9	980	0	0	1	7,840	12	8,876
Clean Sound	0	0	0	0	4	430	0	0	3	36,960	7	37,390
CISPRI	11	421	7	404	9	1,030	0	0	3	18,607	30	20,462
Crowley Maritime	0	0	0	0	0	0	0	0	5	587,235	5	587,235
Delaware Bay & River	3	78	0	0	0	0	0	0	0	0	3	78
EARL	12	143	0	0	0	0	0	0	6	8,400	18	8,543
Foss Environment	25	1,052	0	0	0	0	0	0	14	246,636	39	247,688
Marine Pollution Control	0	0	0	0	0	0	0	0	40	20,000	40	20,000
MSRC	0	0	0	0	0	0	14	7,000	0	0	14	7,000
National Response Corp.	0	0	0	0	10	1,000	0	0	0	0	10	1,000
OSRL	3	36	2	162	8	1,309	4	1,256	1	700	18	3,463
Quali Tech	1	10	0	0	0	0	1	500	0	0	2	510
SEAPRO	0	0	4	316	16	2,921	0	0	6	23,100	26	26,337
Southern Waste Services	0	0	0	0	0	0	0	0	0	0	0	0
Unitech of Alaska	21	1,444	0	0	0	0	0	0	0	0	21	1,444
USCG Alaska	12	288	0	0	0	0	0	0	1	666	13	954
USCG Out of Alaska	0	0	0	0	0	0	0	0	68	42,732	68	42,732
SUPSALV Anchorage	7	120	0	0	0	0	0	0	7	20,618	14	20,738
SUPSALV elsewhere	0	0	0	0	0	0	0	0	22	46,564	22	46,564
Total	300	11,919	94	6,203	94	13,869	32	12,656	177	1,060,058	697	1,104,705

nd = no data provided in Ploen (2006).



REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

Table 7. Storage Units by Planholder using Planholder Submittals and Data from Ploen (2006).

Storage Units (Number)	Total	Alaska Tanker			Polar	SR/M	Tesoro
		In Plan	APICOM	Other			
Organization	Units				In Plan	In Plan	In Plan
Alaska Chadux	31		31				31
Alaska Clean Seas	261	261				261	
Burrard Clean	0	0				0	
Clean Bay	12					12	
Clean Caribbean Coop.	12	12			12	12	
Clean Channel	nd		nd				nd
Clean Coastal Waters	5					5	
Clean Gulf Assoc.	0		0				0
Clean Habor	nd		nd				nd
Clean Islands Council	1		1		1		1
Clean Rivers Coop.	13						
Clean Seas	12					12	
Clean Sound	7						
CISPRI	30	30				30	
Crowley Maritime	5					5	
Delaware Bay & River	3		3				3
EARL	18	18				18	
Foss / NRC Environmental	39				39	39	
Marine Pollution Control	40			40		40	
MSRC	14	14			14	14	14
National Response Corp.	10	10				10	
OSRL	18	18			18	18	
Quali Tech	2			2			
SEAPRO	26		26		26		
Southern Waste Services	0			0			
Unitech of Alaska	21				21		
Subtotal	580	363	61	42	131	476	14
Grand Total	580			466	131	511	14

USCG Alaska	13
USCG Out of Alaska	68
SUPSALV Anchorage	14
SUPSALV elsewhere	22
<i>Total Govt Sources</i>	117
<i>Needed 14 Task Forces</i>	168

nd = no data provided in Ploen

(2006)

APICOM includes additional contractors, as per APICOM.org

Other: Commercial Ventures, listed as "no agreements

needed"

Foss is listed as Foss Environmental in Ploen (2006).

Polar Tankers lists it correctly as NRC Environmental

Services

USCG and SUPSALV listed as "Other Equipment Providers".



6. COMMENTS AND CONCLUSIONS

1. The relationships between the planholder and equipment resources are not clearly defined. Within the submitted plans, there are various duplications, inconsistencies, and outdated or expired agreements. Much of this was also noted in the 2001 and 2002 RCAC studies.
2. The use of the APICOM Agreement indicates that equipment requests will be considered by the signatories, but does not guarantee delivery. The use of this mechanism is questionable if equipment for the 14 Task Forces is to be guaranteed. Using this philosophy, contracted membership in a single (smallest / cheapest) member cooperative would provide sufficient equipment to outfit the 14 Task Forces.
3. The inclusion of government equipment (U.S. Coast Guard and U.S. Navy SUPSALV) alone meets the total requirement for boom and skimmers, and 70 percent of the storage requirement. Following this philosophy, the planholders would seemingly have the option of dropping their contractual agreements and relying on government resources to fulfil their obligation in Prince William Sound. The issue of including government equipment was also raised in the 2001 / 2002 RCAC reviews.
4. The planholders, with the exception of partial lists submitted by SeaRiver Maritime, provide no equipment lists for review or verification that the 14 Task Forces can be appropriately outfitted.
5. The Ploen (2006) report financed by the planholders provides a fairly detailed survey of equipment (and is utilized in this report). If the planholders are using this as verification of their ability to provide the out-of-region equipment for the 14 Task Forces, this should be noted and described as part of their submission.
6. No information is provided by the planholders or the Ploen (2006) survey as to the source of personnel to operate the acquired Task Force equipment.
7. With the caveats above, there is sufficient equipment available in the United States and internationally to outfit the 14 Task Forces.

7. REFERENCES CITED

- Gilpatrick and Jones, 1997. Field Monitoring and Out-of-Region Equipment Survey, Study for PWS RCAC, 27 pages.
- Gundlach, E.R. and G. Reiter, 2001. Out-of-Region Equipment Survey, Study for PWS RCAC, 77 pages.
- Ploen, M. and S. Maunder, 2002. Out-of-Region Response Equipment Acquisition Survey, June 2002, Prepared for PWS Tanker Oil Discharge Prevention and Contingency Plan Holders, 78 pages.


REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

Ploen, M., 2006 (with previous input from S. Maunder). Out-of-Region Response Equipment Acquisition Survey, June 2006, Prepared for PWS Tanker Oil Discharge Prevention and Contingency Plan Holders, 31 pages.

8. APPENDIX 1: RELATED INFORMATION FROM PLANHOLDER SUBMITTALS

Alaska Tanker Company.

Figure 8.15 ATC Equipment Access Agreements, 2007 submittal. Text at bottom of

Figure: Resource providers have been contacted to ensure equipment is available as of 00/30/2002 (sic).

ConocoPhillips (Polar Tankers).

Section 7.1, Sources for Immediate Support.

SeaRiver Maritime.

Table AK-301.1 Equipment Access Agreements.
 Certificate of Membership: Clean Bay, Clean Seas, Clean Coastal Waters.
 Contractual Agreements: MSRC, OSRL.

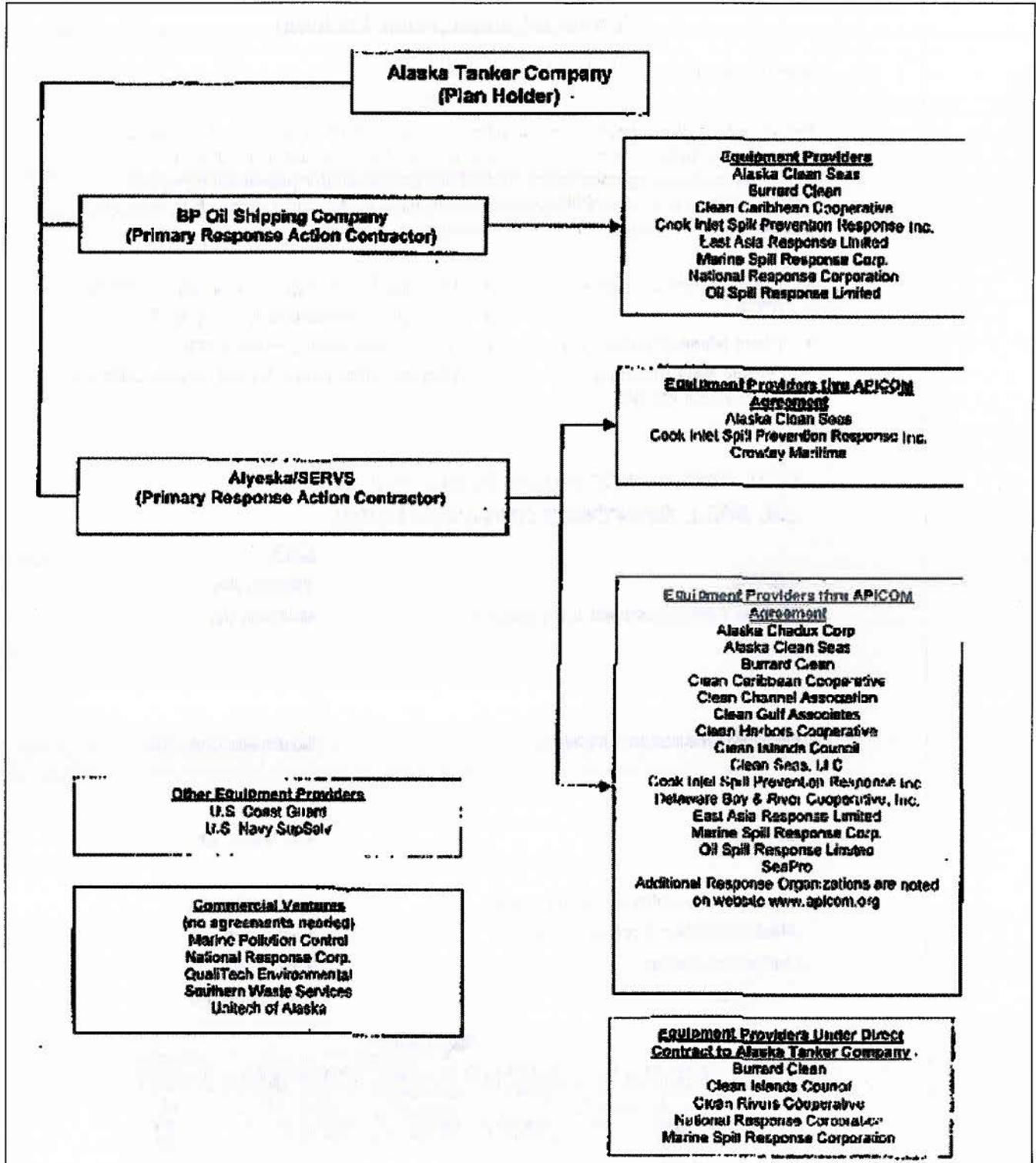
Table 405-7 - Response Resource Activation.

Tesoro

Marine Preservation Association membership agreement.



REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT





REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

ConocoPhillips (Polar Tankers)

7.2 SOURCES FOR IMMEDIATE SUPPORT

Sources of labor and equipment (including on-water, shallow water, and shoreline response resources) in the immediate area include local and national oil spill cooperatives, clean-up contractors, mutual aid groups, and/or petroleum terminals. ConocoPhillips or ConocoPhillips subsidiaries have contractual relationships with the following oil spill response/removal organizations (OSROs):

- Clean Caribbean Americas (CCA)
- Clean Islands Council (CIC)
- Marine Spill Response Corporation (MSRC)
- Maritime Fire & Safety Association (MFAA)
- NRC Environmental Services (NRCES)
- Oil Spill Response Limited (OSRL)
- Ship Escort/Response Vessel System (SERVS)

DOTP ZONE: PRINCE WILLIAM SOUND, AK (Cont'd.)

OIL SPILL RESPONSE ORGANIZATIONS:

	<u>CITY</u>
SERVS Marine Spill Response Corporation	Valdez, AK Ruston, VA
Oil Spill Response Limited	Southampton, UK
Seapro	Ketchikan, AK
Alaska's Operations Control Center	Anchorage, AK
Alaska Pollution Control Center	Anchorage, AK
Unitech of Alaska	Anchorage, AK
Veco, Inc.	Anchorage, AK





REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT



RESPONSE CONTRACTOR CERTIFICATION

This letter confirms that National Response Corporation (NRC) has a Vessel Spill Response Agreement, Contract Number 7638, with Polar Tankers, Inc. ConocoPhillips to provide Shoreline Cleanup services for Polar Tankers, Inc. vessels. NRC confirms that Polar Tankers, Inc. is authorized to reference NRC resources and certifications in its state and/or federal vessel contingency and response planning documents for Shoreline Cleanup pursuant to terms of the Agreement.



179 SAND ISLAND ROAD
HOUSTON, TEXAS 75219
8321 840-8485
8321 840-8487 FAX

June 9, 2008

ConocoPhillips Marine
Polar Tankers, Inc.
800 N. Dairy Ashford
Houston, TX 77210-4784

Attention: Mr. Fred LeJeune

Re: Letter of Intent to respond to an oil spill incident.

The Clean Islands Council Inc. is a U.S. Coast Guard certified Class MM OSMO, cooperative designed to respond to member spills at locations within our "Area of Interest". Our defined "Area of Interest" includes the commercial harbors and waters surrounding the main Hawaiian Islands.

This is to advise you that ConocoPhillips Marine/Polar Tankers, Inc. is a member in good standing of Clean Islands Council Inc. We will provide oil containment and cleanup services according to the terms and conditions of the Clean Islands Council's Contract Agreement.

Oil Spill Response Limited

Lower William Street
Southampton
SO14 5DB

Tel: +44 (0)23 80 391851
Fax: +44 (0)23 80 391872
e-mail: oil@oil.co.uk

13 December 2002

Mr Dale Sumner
ConocoPhillips
Manager - Crisis Management and Emergency Response
800 N. Dairy Ashford (77078 - 1175),
Rm MA1108
Po Box 2197
Houston
TX 77252-2197
USA

Dear Dale

This letter is to confirm Oil Spill Response Limited relationship with Conoco Inc. and Polar Tankers



REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

Table AK-302.1

Equipment Access Agreements

SeaRiver Maritime, Inc.

Alaska/SERVS
(Primary Response Action Contractor)

Mutual Aid Agreements
Alaska Clean Seas
Cook Inlet Spill Prevention Response Inc.
Crowley Maritime

Equipment Providers Thru APICOM Agreement
Alaska Chadux Corp.
Alaska Clean Seas
Burrard Clean
Clean Caribbean Cooperative
Clean Channel Association
Clean Coastal Waters, Inc.
Clean Gulf Associates
Clean Harbors Cooperative
Clean Island Council
Clean Seas, LLC
Cook Inlet Spill Prevention Response Inc.
Delaware Bay & River Cooperative, Inc.
East Asia Response Limited
Marine Spill Response Corp.
Oil Spill Response Limited
SeaPro
Additional Response Organizations are noted on website www.apicom.org

ExxonMobil Corporation
(Primary Response Action Contractor)

Equipment Providers Under Contract
Alaska Clean Seas
Clean Caribbean Cooperative
Clean Coastal Waters, Inc.
Clean Seas, LLC.
East Asia Response Limited
Marine Spill Response Corporation

These providers are also under direct agreement

Equipment Providers Under Contract
Burrard Clean
Clean Islands Council
Foss Environmental Services
Marine Pollution Control
National Response Corporation

Other Equipment Providers
U. S. Coast Guard
U.S. Navy Supervisor of Salvage

Notes:
Resource providers have been contacted to ensure equipment inventories are maintained as of 6/30/02.

CERTIFICATE OF MEMBERSHIP



Issued to:

SEARIVER MARITIME, INCORPORATED



REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

CERTIFICATE OF CONTRACTUAL SERVICES
CLEAN SEAS

Issued to:
SEARIVER MARITIME, INC.

shall remain in effect from January 1, 2002 until properly terminated, or December 31, 2002,
 whichever shall first occur.



CLEAN COASTAL WATERS, INC.

December 18, 2001

The purpose of this letter is to confirm that SeaRiver Maritime, Inc. is included in ExxonMobil Corporation's Clean Coastal Waters, Inc. membership. As such, Clean Coastal Waters, Inc. (CCW) can be listed in SeaRiver Maritime's contingency plans as being their oil spill response contractor. CCW will respond directly to spills at the request of SeaRiver Maritime.

**MARINE SPILL RESPONSE CORPORATION
 SERVICE AGREEMENT**

EXECUTION INSTRUMENT

The **MSRC SERVICE AGREEMENT** attached hereto (together with this execution instrument, the "Agreement"), a standard form of agreement amended and restated as of September 27, 1996, is hereby entered into by and between:

ExxonMobil Refining & Supply Company, a division of Exxon Mobil Corporation


REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

OIL SPILL RESPONSE LIMITED

- and -

ESSO EUROPE AFRICA SERVICES INC.

PARTICIPANT'S AGREEMENT

TABLE 405.7 – RESPONSE RESOURCE ACTIVATION

CONTRACTOR NAME	CONTACT NAME	LOCATION
Marine Pollution Control (MPC) www.marinepollutioncontrol.com	Dave Usher	Detroit, Michigan
Maritime Fire and Safety Association (MFSA) www.mfesa.com/	Brent Way	Portland, OR
Clean Seas Corporation (CS) www.cleansea.com/	Merel Jacobs	Carpentaria, CA
Clean Channel Association	Phil Glenn	Pasadena, TX
Miller Environmental Group www.millerenv.com	Raymond Hackmyer	Staten Island, NY
Tosoro Alaska Company www.tosoroglobal.com	John Kwietniak	Kenai, Alaska
Industrial Cleanup, Inc (ICI) (Associated Gulf Coast Responders)	Rusty Johnson	Garyville, LA
Delaware Bay & River Cooperative	Eugene Johnson	Lewis, DE
Clean Harbor Environmental Svcs. www.cleanharbors.com	Bill Howard	East Providence, RI
Clean Harbors Coop	Dennis McCarthy	Linden, NJ
Clean Island Council www.cleanislands.com	Kim Beasley	Honolulu, HI
Cook Inlet Spill Prevention & Response Inc. (CISPRI)		Nikiski, Alaska



REVIEW OF PLANHOLDER'S OUT-OF-REGION EQUIPMENT

TESORO (MPA / MSRC membership)

MEMEBERSHIP AGREEMENT

This MEMBERSHIP AGREEMENT dated as of April 1, 2001 (this "Agreement") between Seabulk Offshore International, Inc (the "Company") and MARINE PRESERVATION ASSOCIATION, a nonprofit membership corporation organized under the laws of the State of Arizona (the "Association").

