

Implementation of Alaska Tanker and Nontank Vessel APC's in Alaska

The Alaska Maritime Prevention and Response Network is a non-profit organization established to implement alternative spill response and prevention measures that most cost effectively meet the environmental protection objectives of state and federal regulations.

ALASKA

OIL SPILL TECHNOLOGY SYMPOSIUM UNIVERSITY OF ALASKA FAIRBANKS March 6-7, 2014



Implementation Tanker and Nontank Vessel Alternative Planning Criteria in Alaska

- Federal oil spill requirements in Alaska
- How have "APC's" been used in Alaska
- The "why" and "what" of an APC
- Elements and implementation of APC's
- Questions



Federal Oil Spill Requirements in Alaska

- 33 CFR part 155 [vessel related]
 - Subpart D (Tank vessels, Barges, Secondary cargo carriers)
 - Subpart E (Special TAPS tanker provisions)
 - Subpart J (Nontank vessels)
- Response Capability
 - Resources (equipment, people, support)
 - Time on scene



Where 33 CFR 155 Can be Met





Alternative Planning Criteria

"In remote areas, where response resources are not available, or the available commercial resources do not meet the national planning criteria, the owner or operator may request acceptance of <u>alternative planning criteria</u> by the Coast Guard."





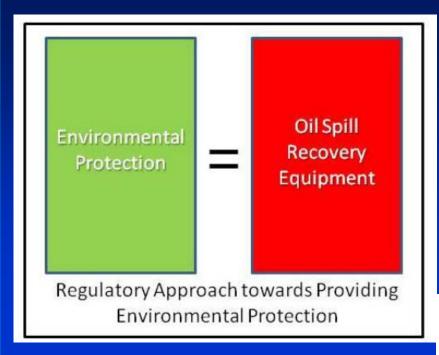
Alternative Planning Criteria (APC) Plans in Alaska

- APC for Tankers Operating in the Gulf of Alaska
- APC for ANS tankers sailing to the Far East
- APC for oil barges operating in Alaska
- APC for tankers operating in Western Alaska
- APC for nontank vessels operating in Western Alaska



33 CFR § 155.5067 Alternative Planning Criteria "minimum requirements of a request"

- 1. Reason(s) and supporting information
- 2. Identification of regulations necessitating the alternative planning criteria request
- 3. Proposals for alternative procedures, methods, or equipment standards,
- 4. Prevention and mitigation strategies that ensure low risk of spills
- 5. Environmental and economic impact assessments of the effects



APC

Incorporates **Prevention Measures** and Capabilities



CG Regulations

Environmental Protection

Oil Spill Prevention Capabilities

Tugs and ETS

Oil Spill Prevention Measures

Offshore Routing and Monitoring

Oil Spill Recovery and Mitigation

SMFF and Oil Spill Recovery Equipment

APC Approach for Oil Pollution Prevention



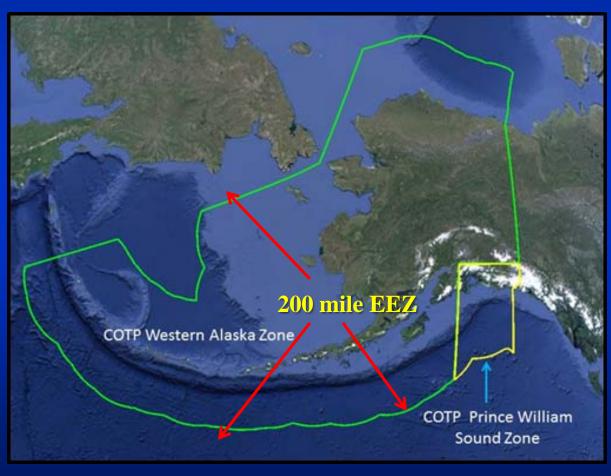
Oil Spill Response Equipment Would Exceed Entire U.S. Capabilities





Application

NTV > 400 GT operating in Alaska waters or transiting to and from U.S. ports within the 200 mile Exclusive Economic Zone (EEZ) of the Coast Guard Captain of the Port Zones

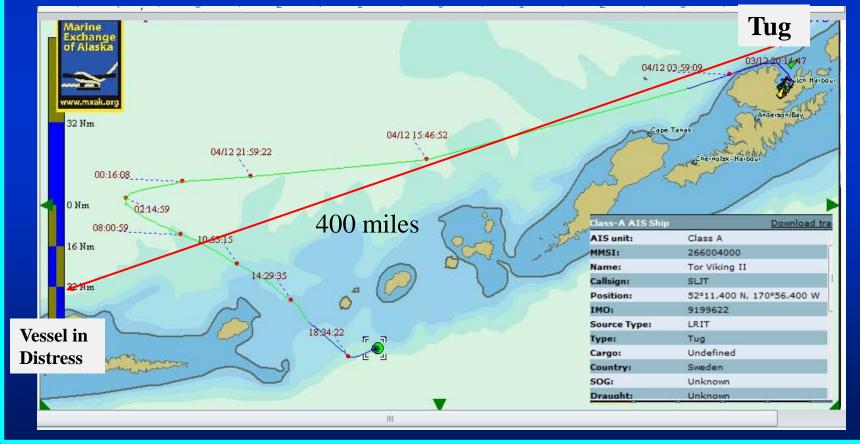




Long Distances

Arrival of oil spill recovery equipment in 24 hrs not feasible



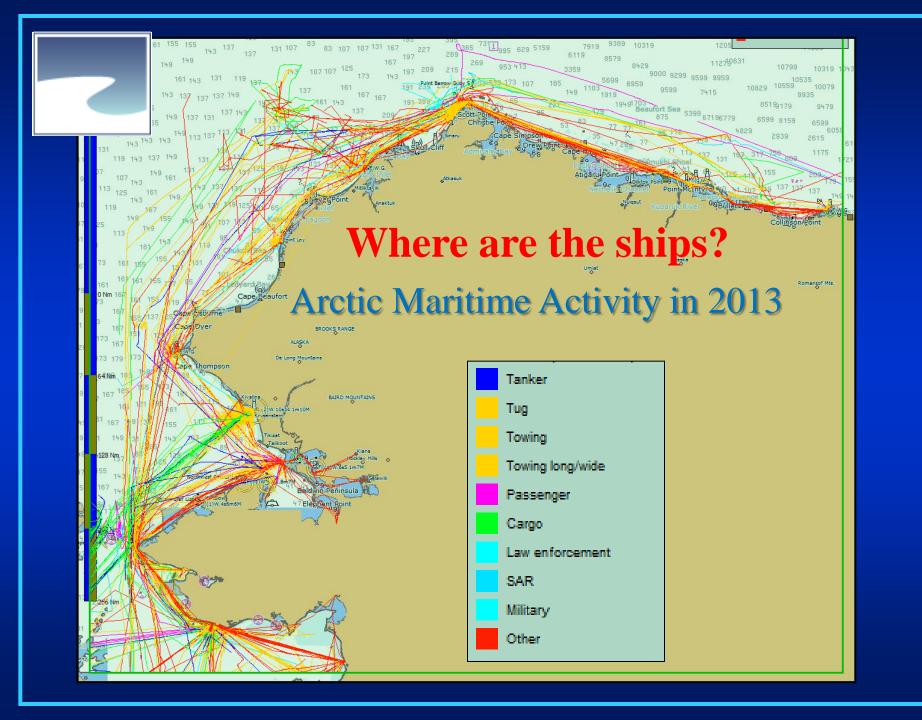














Extreme Weather Conditions

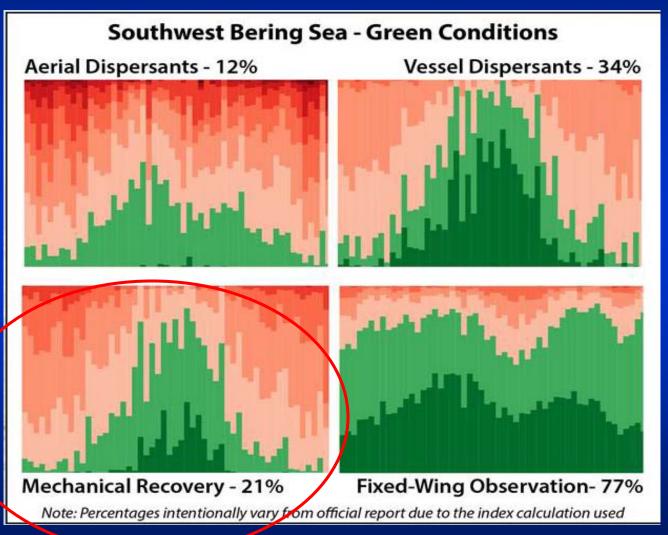
Ability to deploy and effectively use spill response challenged by weather







Effectiveness of Response Resources



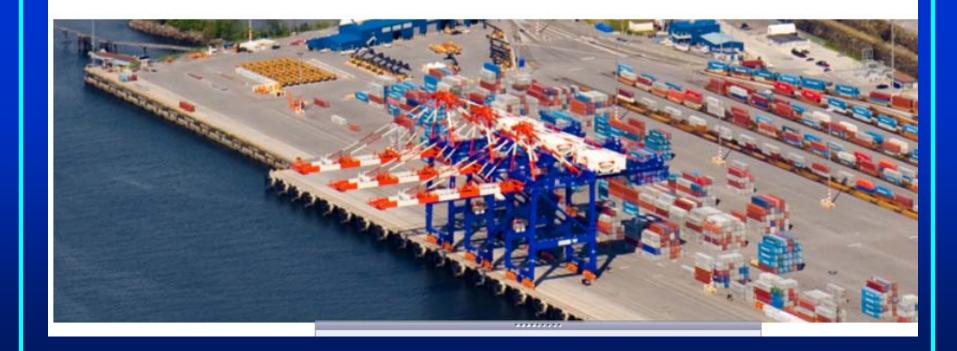


Cost of Full Compliance

Unintended Consequences

Elevated Risk of Environmental Harm and Impact to Economy

Prince Rupert Container Terminal





Lessons Learned

- Selendang Ayu
- Golden Seas
- Steering Casualty Morning Star
- Milos Reefer



PREVENTION Time and Capabilities M/V Golden Seas







Three Core Components of Network APC

Information

Vessel Compliance Monitoring and Response System

Time

Offshore Routing of Vessels

Capabilities

Oil Spill Response Equipment, Tugs, Vessels of Opportunity, Prevention Equipment



Network APC for Tankers and Secondary oil cargo carriers

- Implemented in May 2012
- Second submission in May 2013
- Core components:
 - Risk Reduction Measures
 - Enhanced Response
- Effective in enhancing environmental protection but a Loss Leader



2013 Prevention Enhancements

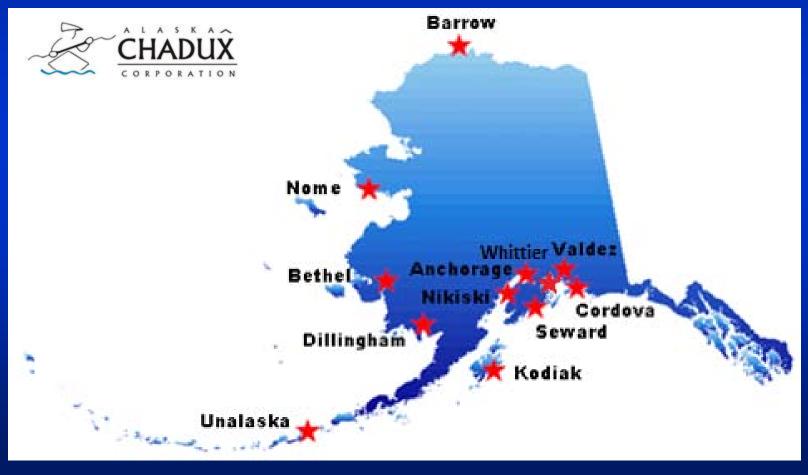
- Initiated and Maintained OPA-90/APC Watch
 - Active Vessel Monitoring Averted High Risk Transits
 - Investigated vessels "Not Under Command"
 - Notified USCG of disabled vessels (Bangkok Bridge)
- Built and Operated AIS Station in Aleutians (Atka)
- Incorporated satellite AIS feeds into "Vessel Compliance Monitoring and Response System"
- Affixed satellite transponders on 10 tugs operating in Western Alaska to help locating them when needed to assist in a response

MXAK Alaska AIS Network





Oil Spill Response Resources Enhancements





Oil Spill Response Resources "Cascade System"





Tanker Singapore Trader OPA-90 non compliant



Diverted Tanker – Stealth Chios





Coast Guard Nontank Vessel Pollution Prevention Regulations

- Final rules published 30 Sept 2013
- Network APC submitted 25 October 2013
- Regulations effective 30 Oct 2013
- Submission of Nontank Vessel
 Response Plans (NTVRPs) and contracts
 to ensure capabilities to respond to a
 worst case discharge in 24 hours required
 by 30 Jan 2014



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Department of Homeland Security

Coast Guard

33 CFR Parts 151, 155, and 160

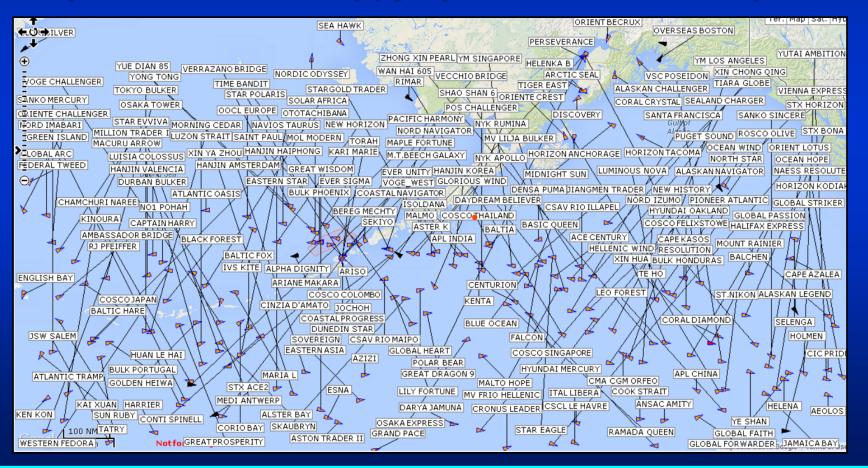
Nontank Vessel Response Plans and Other Response Plan Requirements; Final Rule



Western Alaska Maritime Traffic

Admiral North testimony to Congress re OPA 90

"Once the oil is spilled, the environment will be affected no matter how well the response is orchestrated. Simply put, prevention is still the best response"



Alaska NTV Traffic





25 October 2013 Network APC for NTVs Submitted to USCG

Compliance with the nontank vessel oil spill response requirements not feasible in Western Alaska due to:

- Size and remoteness of the region
- Existing oil spill response equipment falls short of requirements
- Cost of full compliance, deployment of spill response equipment to scene of oil spills offshore in 24 hours, estimated at over \$100M \$200M annually (\$100k per vsl/yr)



Vetting of APC by Maritime Industry

- US Chamber of Shipping
- Pacific Northwest Shipping Assoc.
- World Shipping Council
- Maersk
- APL
- American WaterwayOperators (Pacific)

- Trident Seafoods (Fishing)
- Princess Cruise Lines
- Northwest Cruise Ship Association
- Crowley Maritime
- Alaska Marine HighwaySystem
- ECM Maritime Services
- Compliance Systems



Briefings of APC Agencies & NGOs

- Sector Anchorage
- MSU Valdez
- D17 Staff
- Alaska Governor's Office
- Commissioner ADEC

- NGOS
 - WWF
 - IUCN
 - Oceana
 - Pew
- AK RRT Briefed on Tanker APC

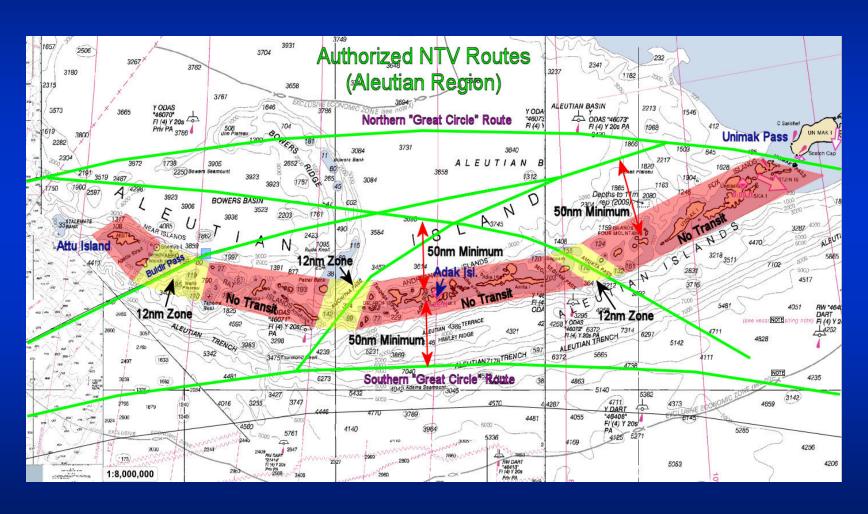


APC NTV Operators"Enrollment for Compliance"

- Operators electing to participate in AK-APC-NTV enroll in Alaska Maritime Prevention and Response Network (Network) over web at www.ak-mprn.org
- Annual fee per vessel required to fund Network ranges from \$2,500 to \$6,500 based on oil capacity
- Vessel operators are required to comply with the "Operating Procedures" that are posted on the Network web site (vessel routing, early notification of incidents, proper programing of AIS)
- Vessel owner/operators provided access to OSRO's and vessel tracking system to assess compliance and to manage responses to incidents



Risk Reduction Routing





Detected Disabled VesselsFailure to Notify of Marine Casualty





Vessel Not Under Command



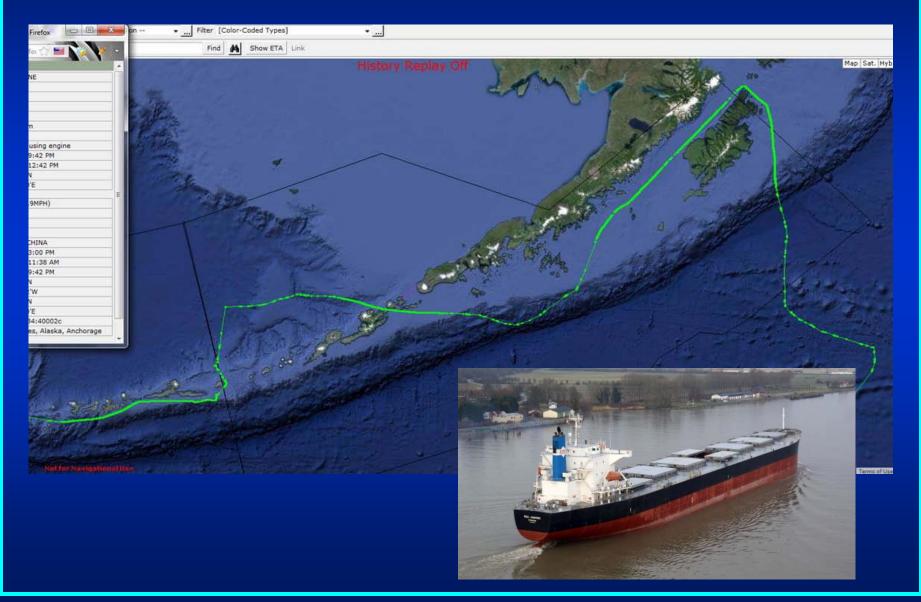


Detected Vessels Not in Compliance with OPA-90





Bulk Cargo Vessel Red Jasmine





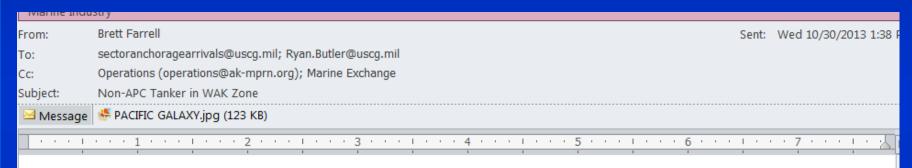
Operating Procedures Compliance 24 / 7 Ship Monitoring







24 Hour Monitoring / USCG Notification



Sector Anchorage-

Please be advised that the following tank vessel is currently operating in the WAK COTP zone and is not a participant in the WAK-APC-T. Current position is approximately 150nm S of Amchitka Island (see attached screenshot).

PACIFIC GALAXY, IMO# 9397793, LPOC Nakhoda, Russia; NPOC (according to Lloyds and the vessel's AIS transmissions) Cherry Point, WA.

Note: This vessel's VRP authorizes it to carry Group 1-4 oils, but the VRP website shows it is not authorized for transit/operation within the WAK COTP Zone.



Oil Spill Response Resources "Cascade System"





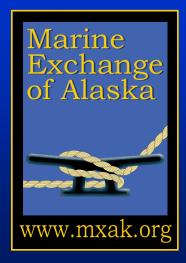
ALASKA MARITIME Prevention & Response Network

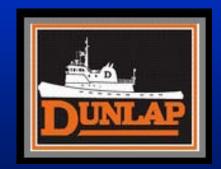




WESTERN TOWBOAT COMPANY

Doing the Job... Whatever It Takes









Allocation of Revenues

- Enhanced Spill Response Equipment
- Enhanced Prevention Capabilities:

Tug Tracking – ETS – Ship Arrestors -VMS

- OSRO Funding
- Administration

"Network" 5 Year NTV Work Plan

	Milestone	YR 1 2014	YR 2 2015	YR 3 2016	YR 4 2017	YR 5 2018
	Network Administration	Administer Programs	Administer Programs	Adminster Programs	Administer Programs	Administer Programs
EnhancedPrevention	24 hour AlS watch	Annual Operations	Annual Operations	Annual Operations	Annual Operations	Annual Operations
	AIS Expansion	Fund expanding terrestrial AIS coverage of APC areas by 5,000 square miles	Fund expanding terrestrial AIS coverage of APC areas by 5,000 square miles	Fund expanding terrestrial AIS coverage of APC areas by 5,000 square miles	Fund expanding terrestrial AIS coverage of APC areas by 5,000 square miles	Fund expanding terrestrial AIS coverage of APC areas by 5,000 square miles
	Storm Refuge Project	Begin study of storm refuge options	Propose and begin to implement storm refuge program	Buildout AIS to support storm refuge program	Maintain and monitor storm refuge program	Continue program
EnhancedResponse	Vessels of Opportunity	Add 5 new vessels in program	Add 5 new vessels in program	Add 5 new vessels in program	Add 5 new vessels in program	Maintain VOO tracking system
	Ship Assist Program	Provide for enhanced emergency towing capability	Allocatefundsfor additional ETS (Emergency Towing System)	Allocate funds for procuring and staging sea arrestor	Exercise ship assist system	Establish capital account to acquire additional system[s]
	Enhance Spill Response Capability	Work with OSRO[s] to evaluate response capability build out options	Allocate capital to procure and stage increased response capability in strategic areas	Allocate capital to procure and stage increased response capability in strategic areas	Allocate capital to procure and stage increased response capability in strategic areas	Allocate capital to procure and stage increased response capability in strategic areas
	Annual Progress Reports	Annual progress report to USCG COTP W-AK	Annual progress report to USCG COTP W-AK	Annual progress report to USCG COTP W-AK	Begin new 5 yearplanning Initiative	Finalize new 5 year plan



NTV APC – WAK/PWS Implementation

- APC development and industry vetting
- APC Submission to USCG
- Web site distribute info, coord enrollments
- Enrollment: 20 person team 7 day week admin and finances.....Rapid Enrollment Program
- 7 x 24 APC watch educating operators / USCG
- 600 enrollments in 4 weeks



APC Prevention & Response Summary

APC Vessels Enhance Maritime Safety by....

- 1. Sailing on reduced risk routes on all voyages
- 2. Providing early notification of incidents
- 3. Funding of Network's "Safety Net" comprised of;
 - Expansion and operation of 24/7 vessel tracking system
 - Monitoring availability of emergency assist vessels
 - Implement shore side emergency vessel assist tools (ETS & drogues)
- 4. Funding strategic enhancement of oil spill response

resources

Thanks you for keeping oil off the water!



Kenai Salmon Company Salamatof Beach, Kenai 2013