

To whom it may concern regarding proposed changes,

Last week I submitted remarks regarding proposed changes. These changes affect my business and my vessels. In fact, a picture of one of my vessels was used on an ADEC Tweet regarding the project. Sundog Charters is probably the only operator of "tank vessels" who would submit a streamlined plan for approval. We currently have a plan covering our vessels under the existing statutes and is valid through 2023.

Although I support this effort, I do not support all changes. Some proposed components are not practical. Although they focus on vessels/barges under 500 bbl, there are very different types of vessels within this range. Why 500 bbls? Any tank vessel over 249 bbl would have to be Inspected by the USCG and would be manned with tankermen. These vessels would be a different class from the small landing craft hauling a few IBC tanks. Any inspected vessel in this class would be part of a bigger fleet with a larger ODPCP plan. Any uninspected "tank vessel" in Alaska would have to obtain a USCG 3302 permit in order to transport fuel and pump to/from tanks onboard. Why not make changes applicable only to vessels in need of this 3302 permit? Why not make these changes apply to vessels transporting under 249 bbls? These are the small operators who don't know how or can't afford to develop a plan. These are the operators you want to welcome into compliance with a realistic and achievable path. These transporters and the areas they serve will benefit from realistic prevention measures.

By our plan, we inspect tanks and pressure test our hoses. We have checklists and secondary containment under all connections. These measures prevent oil from spilling! We don't carry containment boom, I don't know where we would put it. It would be impractical for these vessels to carry 3 x length in boom. A 42' boat like mine would have to carry 200'. This would occupy over 1/3 of my deck space! 6 x length worth of absorbent boom would be very effective if needed. 5" absorbent boom not 8", right?

I also do not have a good feeling about the streamlined Response Action Contractors and IMT's. They will be expensive. What if no existing organizations bother to seek the new designation? There isn't much of a market to attract them. I'm afraid that an organization like mine, one of the few who might seek a streamlined plan, would shoulder the cost these companies would incur if they did seek the Streamlined RAC or IMT designation. Again, not very welcoming to the small operator serving small villages and lodges.

Sincerely,
Colin Daugherty
General Manager



Sundogcharters.com