

## SKIMMER SYSTEM DERATING FOR CONTINGENCY PLANNING

### A Guide for Plan Holders

Under state regulations, oil discharge prevention and contingency plan (plan) holders are required to demonstrate the ability to recover applicable response planning standard (RPS) volumes within specified time frames. 18 AAC 75.445(g)(5) requires that oil recovery skimmers be derated to 20 percent of the manufacturer's rated throughput capacity unless an analysis demonstrates to the satisfaction of the department that another effective daily oil recovery capacity is appropriate for the plan's identified petroleum product and specific operating environment.

Recognizing that each plan holder's operating environment is different, the department reviews a request for a higher skimmer efficiency rating by evaluating not just the skimmer, but the entire system used for recovery, i.e. skimmer, associated pumps and hoses, boom, storage, etc. Any request for a skimming system recovery rate greater than 20 percent must be made by a plan holder and be specific to one plan, with separate requests for each type of petroleum product and each type of environment in which the plan holder operates.

To assist plan holders with the process of requesting approval of higher recovery rates for the skimming systems used in their plans and to account for factors which may be encountered in the "real world" and may diminish the skimming system's recovery capabilities as compared to that achieved in a test tank, the department developed the Request for Skimmer System Efficiency Evaluation (Request) that can found on the department's website: [Forms and Applications](#) .

The Request asks for basic information about the plan and plan holder and specific details about the skimming system being tested, the petroleum product being collected, the specific operating environment the skimming system is being used in, and the factors which may affect the system's performance (additional pages should be attached as needed to ensure that the department has received all necessary data). A separate Request must be provided for each product type, operating environment, and containment system intended to be used. This information will be evaluated by the department to determine the final efficiency rating for the proposed skimming system and circumstances.

The department requires that plan holders discuss this process and their proposals with the department before submitting a Request to help ensure that department staff have an opportunity to attend the test, all questions are answered, and that correct information is gathered the first time, thus reducing the possible need for additional testing.