

**Pacific States/British Columbia
Oil Spill Task Force**

**Original 1996
Mutual Aid Agreement
Revised 2011**

For the:

State of Alaska

Province of British Columbia

State of Washington

State of Oregon

State of California

State of Hawaii

Pacific States/British Columbia Oil Spill Task Force Mutual Aid Agreement and Statement of Authority

The member agencies of the Pacific States/British Columbia Oil Spill Task Force are committed to assuring a best achievable response to oil spills in our coastal and inland waters. In order to further this goal, it may be necessary to rapidly move spill response resources from one jurisdiction to another during spill events. Therefore, the Task Force member agencies agree to:

1. Implement the attached mutual aid policy with the intent of maximizing the availability of private and public sector response resources during oil spills where assistance is requested by another Member;
2. Maintain relative equivalency among Member Agencies' approaches to mutual aid, to assure effective reciprocity; and
3. Keep other Task Force Members apprised of policy and procedural changes affecting this Mutual Aid Agreement.

This agreement is adopted pursuant to, and follows the intent of, the Oil Spill Memoranda of Cooperation of 1989 and 2001 and was adopted on August 24, 2011 by the following Pacific States/British Columbia Oil Spill Task Force Members:

Larry Hartig, Commissioner of the Alaska Department of Environmental Conservation

Cairine MacDonald, Deputy Minister of the British Columbia Ministry of Environment

Scott Schaefer, Acting Administrator for the Office of Spill Prevention and Response of the California Department of Fish and Game

Gary Gill, Deputy Director for Environmental Health in the Hawaii Department of Health

Jeff Christensen for Dick Petersen, Director of the Oregon Department of Environmental Quality

Dale Jensen, Spills Program Manager at the Washington Department of Ecology

Pacific States/British Columbia Oil Spill Task Force Mutual Aid Agreement

SECTION 1.0 - PURPOSE, SCOPE, AND BACKGROUND

1.1 Purpose

The purpose of the policies and procedures established in this Agreement is to set specified conditions whereby certain contingency plan holders may be allowed to release response equipment and/or personnel to another plan holder in order that their response equipment may be available for mutual aid. This agreement thereby assures that most of the spill response equipment on the West Coast will be available to respond rapidly in the event of a major spill.

1.2 Background

The Task Force adopted a Mutual Aid Plan in July 1993, in which the members agreed to expedite all decisions relating to mutual aid requests among members. Under this Plan, mutual aid requests by Task Force members can result in assistance ranging from technical assistance and sample analysis to extensive cross-boundary deployment of state/provincial personnel and equipment. However, the plan was limited to reciprocal efforts by the Task Force member agencies and did not affect private sector response resources or plan holders.

The West Coast states and the Canadian and United States Coast Guards set response standards for spill response plan holders and require that the contingency plan holders prepare plans to implement these standards. During some spills, it may be necessary to expedite the transfer of additional response capabilities which are only available through private contractors. Many of these contractors have signed commitments with facility and/or vessel plan holders which, if released, could place the plan holder out of compliance with their federal and state approved spill contingency (response) plans. This situation could result in delays in the "cascading" of response equipment and personnel to the spill site.

At the time of the adoption of the 1993 Mutual Aid Plan, it was recognized that in order to cascade response resources into other jurisdictions, some Task Force members might have to release some local facility and vessel owners (plan holders) from full compliance with their response plans. Such a release would allow a portion of the plan holder's response capabilities to be moved to the site of the spill. However, when the 1993 Agreement was signed not all Task Force members had a mechanism in place to expedite or pre-approve the release of plan holders from compliance with regulatory response standards. It was agreed that decisions on such releases would have to be made on a case-by-case basis until a more refined policy could be adopted.

The Task Force established a Mutual Aid Work Group which consisted of private and public sector participants to evaluate options and draft a policy and procedures which maximize the opportunity for rapid mutual aid. The Mutual Aid Work Group found that the varied legal authorities of the West Coast States, the Province of British Columbia, federal agencies, and the complex network of private sector response contracts and agreements complicates establishing a streamlined policy and procedure. The consensus recommendation of the work group was that, if possible, mutual aid policies in each jurisdiction should approve the release

of private response equipment with a minimum of conditions beyond establishing requirements for resident equipment which would always remain available for immediate access by the plan holder. The underlying concepts of this Agreement are the product of the Work Group's recommendations.

During the response to the Deepwater Horizon oil spill in the Gulf of Mexico, the Oil Spill Task Force Members faced the limits of North American mutual aid with their isolation from the rest of the continent. These limitations were particularly striking, at least with regard to the time needed to move large response vessels through the Panama Canal to the Gulf Coast or Eastern Seaboard of the United States and Canada. With that in mind, Task Force members decided to revisit and reaffirm their mutual aid agreements in order to ensure that they are current and robust, as well as to ensure that these agreements will function during a Spill of National Significance in either member nation. They further acknowledge that based upon the clear equipment deficiencies during the Gulf spill, mutual aid agreements are not a substitute for building adequate regional response capacity in all coastal areas.

1.3 Scope

This Agreement establishes policies and implementation procedures whereby mutual aid, if requested by another Task Force Member agency through Unified Command¹, can be approved during responses to West Coast spills. The jurisdictional policies established in this Agreement presumes 1) that loaned equipment will stay in the Pacific Region; and 2) that other Task Force Member agencies can cascade response equipment if needed to cover for equipment sent out of one jurisdiction in response to a mutual aid request from another jurisdiction. In the event that response equipment is removed entirely from the Pacific Region to assist with a Spill of National Significance elsewhere in the U.S. or Canada, the Task Force Member agencies will reconsider their state/provincial specific policies as listed in Section 2 of this Agreement on a case-by-case basis.

This Agreement also includes related recommendations and encourages evaluation of a more consistent approach to requests from non-member entities. This Agreement represents the policy of the signatory agencies and does not supersede federal, state, or provincial laws and regulations. This Agreement does not address mutual aid by federal agencies and does not supersede any private contractor emergency response plans or private sector contract currently in place. In addition, any private sector response resources over and above those committed to fulfilling the legal requirements of a facility/vessel response plan are not affected by this Agreement. Task Force members do not have authority to require that private spill response contractors provide mutual aid assistance, but intend to work closely with all parties during the response to spills for which mutual aid is requested.

¹ The term “Unified Command” as used in this Agreement means that the federal On Scene Coordinator (OSC), state or provincial OSC, and the responsible party’s OSC share command decision-making in an Incident Command System.

2. POLICY AND PROCEDURES

2.1 Task Force Policy Statement

It is the policy of the Pacific States/British Columbia Oil Spill Task Force member agencies to maximize the availability of private sector response resources during oil spills both by streamlining the process necessary to approve mutual aid between member agencies, and by establishing conditions under which plan holders may be relieved from responsibility for some aspects of response plan compliance during mutual aid requests.

To implement this policy, Task Force members have adopted minimum requirements for resident, non-cascadable response resources (see member specific sections below). These minimum requirements for resident response systems assure the continued ability of plan holders to initiate effective response action at their facility/vessel, should a spill occur while a portion of their response capability is out of the jurisdiction for purposes of mutual aid. Furthermore, each Task Force member agency will work with any plan holders and major response contractors affected by the movement of response equipment for the purpose of providing Mutual Aid to ensure that all spill response needs are adequately met. This policy applies to all facility (both inland and marine) and vessel response plans approved by the member agencies.

This Agreement provides for reciprocal mutual aid among the Task Force member jurisdictions during oil spills; it does not authorize mutual aid to other coastal states and provinces other than signatories to this Agreement. Decisions on specific requests for aid from other jurisdictions will be made on a case-by-case basis.

Specific response standards have been established by each Task Force member jurisdiction consistent with their unique legal and policy environments. However, it is the Task Force's intention that the specific resident equipment standards be as liberal as possible and provides relative equivalency between members to assure effective reciprocity.

2.2 Mutual Aid Procedures

The Task Force members hereby adopt the following procedure to expedite mutual aid decisions during West Coast oil spills. This procedure is illustrated in the decision flow chart shown in Appendix A. This procedure and decision flow chart provide a uniform West Coast decision making process for initiating requests for mutual aid and implementing the individual state/provincial policies for resident response system requirements:

1. Approval - Mutual aid requests for response resources can be approved by a Task Force Member Agency according to the specific jurisdictional policy conditions outlined in the following sections and consistent with state/provincial statutes and regulations.

2. Notification - After a decision by a Unified Command (UC) on the West Coast to request additional response resources, there will be direct and concurrent notifications as follows:

- From the Task Force member requesting mutual aid to the Task Force Member who is being requested to allow a regulated contractor to provide mutual aid. This notification will formally invoke this Agreement;
- From the Responsible Party (RP) or other UC member to the OSRO(s) and other response contactors whose assistance is requested. (Note that plan holders must comply with applicable regulatory notifications.)
- From the OSRO requested to move equipment to the plan holders under contract;
- From the plan holder whose OSRO's equipment is requested to leave the area to the Task Force Member agency whose area is affected; and
- The Task Force Member agency will work with the plan holder and the OSRO in an effort to resolve their concerns and establish other response coverage and spill prevention measures as necessary.
- Where appropriate, the requests will be coordinated with the Area Committees and other decision-making bodies.

3. Non Task Force Member Requests - Requests for mutual aid responses from non-signatories will be handled on a case-by-case basis by the member agencies. The Task Force will encourage other states and provinces to review and consider becoming a party to this Agreement.

4. Transboundary Spills - An exception to this Agreement may occur in cases where a spill in one jurisdiction is likely to impact waters of an adjacent jurisdiction. In such cases the Unified Command requesting mutual aid will collaborate with their counterparts on system deployment and may not invoke this agreement with the adjacent jurisdiction. The Members will assure a coordinated response action using all necessary resources.

5. Time Frame - There will be a consultation within 30 days after mobilization between the Task Force representatives affected to discuss the continued need to deploy the response resources.

6. Demobilization - First priority will be given to the demobilization of equipment provided through Mutual Aid unless this equipment has proven to operate more effectively than other equipment.

7. Post Response Evaluation - After each event, the Unified Command will forward a brief report on the effectiveness of the mutual aid process and policy to those entities providing mutual aid. The Task Force will review the report and determine if changes to the mutual aid procedures should be instituted.

2.3 Jurisdictional Policy Statements

Alaska Specific Policy

The Alaska Department of Environmental Conservation fully supports mutual aid. The Department promulgated regulations several years ago acknowledging the need to have a system in place that allows contingency plan holders to drop below statutorily mandated response capabilities during spill events in other areas. The regulations also reflect that the public demands enhanced spill prevention efforts in certain instances when response capability is temporarily reduced. The regulations preceded Task Force discussions on mutual aid and are intended to support mutual aid. The Department has a system in place to pre-approve, or to rapidly approve on a case-by-case basis, the release of equipment to other jurisdictions that will support the intent of the mutual aid agreement.

Alaska's minimum response equipment retention levels are defined in statute by response planning standards. Each standard is based on the type of regulated oil industry operation, its size and the receiving environment. Based on the largest approved response planning standard (RPS) volumes and the largest vessels currently operating in Alaska, minimum resident equipment levels for each of the ten Alaska subareas are listed below. Please note that Alaska has an over arching Area Plan and 10 Subregional area specific contingency plans. All RPS are based on a 72 hour response, contain and cleanup standard except where noted could be approximated as follows:

COAST GUARD SECTOR ANCHORAGE COTP ZONE

- Aleutian Islands to land: 26,190 bbl
- Aleutian Islands to water: 54,745 bbl
- Bristol Bay to land: refined product, 22,562 Bristol Bay to water: 28,381 bbl
- Cook Inlet to land: refined product, 91,865 bbl
- Cook Inlet to water: crude oil release over 15 days, 82,500 bbl
- Interior Alaska to land: 52,500 bbl (PS5)
- Interior Alaska to water: 34,025 bbl (TAPS)
- Kodiak Island to land: 10,830 bbl
- Kodiak Island to water: 22,500 bbl
- Prince William Sound to land: 50,350 bbl (VMT)
- Prince William Sound to water: crude oil in region 300,000 bbl w/in 72 hours.
- North Slope to land: 73,500 bbl
- North Slope to water: crude oil release over 15 days, 300,000 bbl (Liberty)
- Northwest Arctic to land: 15,085)
- Northwest Arctic to water: 54,745 bbl Western Alaska to land: 13,247 bbl
- Western Alaska to water: 54,745 bbl

COAST GUARD SECTOR JUNEAU COTP ZONE

- Southeast Alaska to land: 13,716 bbl
- Southeast Alaska to water: 25,059 bbl

The emergency transfer of response resources between contingency plan holders within Alaska, or to another person (including a person outside Alaska), is regulated under 18 AAC 75.470. To facilitate mutual aid with other signatories of this agreement and comply with 18 AAC 75.470, Alaska contingency plan holders should request written pre-approval from the Department of an emergency transfer. Alaskan

contingency plan holders must clearly identify, in advance, the specific response resources intended for emergency transfer.

If a proposed equipment transfer would reduce the quantity or quality of response resources used by a plan holder (or group of plan holders) for demonstration of compliance with an approved contingency plan, then the Department may attach temporary terms and conditions where practicable, as compensating measures to prevent spills or to reduce the magnitude of potential discharges (18 AAC 75.470(b)(1)(E)). To expedite mutual aid in the event of an emergency outside Alaska, contingency plan holders should negotiate these terms and conditions in advance with the Department as part of their mutual aid proposal. Contingency plan holders are encouraged to consult Appendix B of this agreement for a partial listing of temporary compensating measures that may be included with their proposal.

British Columbia Specific Policy

The 1993 amendments to the Canada Shipping Act have established a comprehensive spill preparedness and response regime. This regime is essentially comprised of rules requiring vessels and shore-based oil handling facilities to have Oil Pollution Emergency Plans (OPEP) and to subscribe to a Canadian Coast Guard Certified Response Organization (RO). Standards for preparing OPEPs and establishing a RO have been prepared and are referenced under Chapter 36 of the Canada Shipping Act.

Publication (gazetting) of vessel OPEPs occurred on April 4, 1995 and the regulation (rule) is in effect. Final rules are completed, and designated oil handling facilities have 90 days to submit a OPEP, and companies seeking RO status can submit their plans for certification by the Canadian Coast Guard.

The British Columbia Ministry of Environment agrees to actively support the cascading of any federally mandated response capabilities in order to achieve a high level of marine oil spill preparedness on the Pacific West Coast. Pursuant to Unified Command or Task Force Member requests and where spilled oil affects shared US/Canadian waters, the amount and types of response equipment allowed to be cascaded will be a joint Unified Command decision by the federal and provincial on-scene commanders. Pursuant to Unified Command or Task Force Member requests and where spilled oil does not threaten Canadian waters, the cascading of any surplus response capabilities above that needed to meet the federal 10,000 tonne recovery standard is a matter for industry and the Canadian Coast Guard to decide. The Ministry of Environment will coordinate with the Canadian Coast Guard and industry to encourage and facilitate a decision compatible with the spirit of this Agreement.

California Specific Policy

California fully supports mutual aid among the members of the Pacific States/British Columbia Oil Spill Task Force. California works pro-actively with the federal government, oil spill response organizations, plan holders and other states to ensure availability of personnel and equipment to respond to spills. California believes that a strong, viable mutual aid plan will ensure all member agencies the assistance needed to respond to large oil spills in their respective jurisdictions.

California marine facility and vessel owners/operators are responsible for maintaining the appropriate level of response personnel and equipment at all times within the risk zone where they are located or navigate based upon their response planning volumes.

Notification - Invoking the Mutual Aid Agreement

This agreement must be invoked before the Unified Command in charge of an oil spill response in a member state or province can directly request cascadable oil spill response resources located in California. To invoke this agreement the OSPR Administrator shall be notified by the affected state or province that is party to this agreement, specifically the:

1. Alaska Department of Environmental Conservation
2. British Columbia Ministry of Environment
3. Washington Department of Ecology
4. Hawaii Department of Health
5. Oregon Department of Environmental Quality

The requesting party shall contact the the OSPR Administrator during business hours at (916) 445-9326 and via the California Emergency Management Agency at (916) 845-8911 during non-business hours.

Basis for Mutual Aid and Waiver

Once notification has been made and discussion with the Administrator completed, the movement of cascadable oil spill response resources from California to another member state or province, consistent with the cascadable equipment policies delineated herein, shall be deemed to be approved by the Administrator. This movement shall also be deemed to have occurred under the approval of the Administrator for the purposes of California Law and the California Marine Oil Spill Contingency Plan. As a result of this consent, facility and vessel owners/operators that would otherwise be required to meet the Daily Recovery Rates, as set by regulations, are granted the necessary waiver from this obligation.

Mutual Aid Policy

Once this agreement has been invoked, the Unified Command of the affected member state or province may directly request cascadable response resources located in California. This policy does not, however, affect private sector contractual obligations. It does not guarantee that the oil spill response organization(s) (OSRO) contacted by the Unified Command will respond to the request for mutual aid. After the agreement has been invoked, no further notifications to the Administrator are required by any party in regard to the movement of cascadable resources. This policy has no bearing on any notification requirements that may exist in contracts between OSROs and owners/operators of marine facilities and vessels.

Waiver

After this agreement has been invoked, California waives the 6-, 12-, 24-, 36-, 48-, 60- and 72-hour requirements for Daily Recovery Rates, as set by regulations, for those owners/operators of facilities and vessels whose OSRO(s) provide(s) cascadable oil spill response resources to Unified Command located in the affected member state or province.

Measures to Offset Risk in California

California, through the Administrator, may require mitigation measures on a case-by-case basis to offset any identified risk created by oil spill response resources leaving any risk zone and subsequently leaving the State under this agreement. The OSPR Administrator shall consult with the affected USCG Captain(s) of the Port, the California Coastal Commission, the California State Lands Commission and the U.S. Minerals Management Service prior to instituting any mitigation measures. The purpose of mitigation measures is to ensure that with the absence of oil spill response equipment in any risk zone, appropriate environmental safeguards are in place.

Demobilization

Response resources residing in California shall be the first to be demobilized from the spill response area prior to resources that are located in another member state or province, except where specific pieces of equipment that are necessary to the response effort are available only from California.

Hawaii Specific Policy

The Hawaii Department of Health fully supports mutual aid between the Oil Spill Task Force members. Any request for the State owned Air Deployable Dispersant System (ADDS) will be approved on a case-by-case basis.

Oil Spill Response Organizations (OSROs) operating in Hawaii will be bound by current member agreements and previously agreed upon company mutual aid policies.

Oregon Specific Policy

Non-Cascadable Equipment Requirements

Plan holders must meet the 12 hour and lower hourly response standards (6 hours, 2 hours, 1 hour) at all times. The 12 hour response standard is designated as the "resident" response capability. This resident capability will assure that an effective spill response will be maintained until additional resources are cascaded into the region, even though some resources may have temporarily left the area.

Basis for Mutual Aid and Waiver

A waiver for the 24, 48 and 72 hour response standards may be approved based on measures to offset operational risks for those facilities and vessels whose response contractor is affected by requests for mutual aid from a Unified Command. Decisions on mutual aid beyond 30 days will be made on a case-by-case basis.

When a request for mutual aid comes to an Oregon State private response contractor or Cooperative from a Unified Command in another jurisdiction, the contractor or Cooperative may respond directly to the spill with equipment beyond the 12 hours resident equipment capacity. This policy does not directly affect private sector contractual obligations, nor does it relieve plan holders from notifying the DEQ within 24 hours of changes to their response capabilities.

OREGON'S NON-CASCADABLE OIL SPILL RESPONSE EQUIPMENT REQUIREMENTS

USCG COTP ZONE

EQUIPMENT REQUIREMENT

COTP ZONE PORTLAND

Boom (feet)	40,000
Recovery (derated bbls per day)*	15,000
Storage (bbls)**	22,500
Personnel sufficient for deployment and operation of the above equipment	

* Recovery volume is based on five percent of a plan holders worst case spill or 36,000 barrels per day whichever is less.

** Storage is based on 1.5 times the recovery volume.

Washington Specific Policy

The Washington Department of Ecology supports an aggressive mutual aid posture among Task Force member agencies. Ecology also supports mutual aid to other North American jurisdictions, to the extent Washington state retains adequate resources to deliver a rapid, aggressive and well coordinated response to in-state spills.

During the 2010 *Deepwater Horizon* oil spill in the Gulf of Mexico there was a large shortage of “resident” response equipment to respond to that worst case spill. That equipment shortage resulted in the *Deepwater Horizon* Unified Command needing to obtain an enormous amount of additional resources from a variety of sources including mutual aid from other coastal states.

The Gulf oil spill response also helped Ecology clear up the misconception that regulatory agencies are able to unilaterally release private sector resources. Releasing equipment and personnel for the purpose of providing mutual aid requires close coordination among response contractors, contingency plan holders, regulatory agencies and other response partners.

Ecology uses a Green-Amber-Red analysis matrix to rapidly evaluate requests for aid, facilitate decision-making, document any agreed upon equipment backfills and prevention measures, and analyze the potential impact on local response capacity. The matrix is also available during spill incidents as a guidance document for response contractors and the regulated industry. The 3-color matrix also ensures an expedient but deliberative decision making process, and helps maintain public confidence in decisions that have the potential to affect the state’s natural, cultural and economic resources. Other purposes of matrix are to help Ecology monitor the state’s response capability and to set a minimum level resident of response readiness, below which Washington cannot fall.

Once a specific mutual aid request is submitted to Ecology by a Task Force member agency, the department will use the matrix to maximize the amount of assistance that can be provided. Washington state’s decisions will also be guided by the goal of having cascadable response equipment available for backfilling state capabilities and/or having additional prevention measures in place whenever possible. All final decisions to release equipment will be made in collaboration with response contractors, plan holders and partnering agencies, and will be communicated to the public.

3.0 MUTUAL AID RECOMMENDATIONS

3.1 Mutual Aid Recommendations

In order to improve West Coast mutual aid during major oil spills, the Task Force hereby adopts the following recommendations:

Private Sector Agreements – It is recognized by all parties that this procedure and policy will not be fully effective without the private sector establishing mutual aid agreements among US Oil Spill Response Organizations (OSROs) and Canadian Response Organizations (ROs) and between plan holders and their OSROs/ROs. The Task Force recommends that the private sector continue to pursue mutual aid agreements among major response contractors, and between plan holders and their response contractors. Several response cooperatives have already signed agreements and others have agreed to be providing the “resident equipment.” This designation of resident OSROs will assist in the release of private contractors who wish to compete for the response work.

Inventory of Response Equipment – It is recommended that the private sector response organizations maintain an inventory of response capabilities on the West Coast which can be immediately accessed in the event that mutual aid is needed. In the Pacific Northwest, the Western Region Response list exists for this purpose.

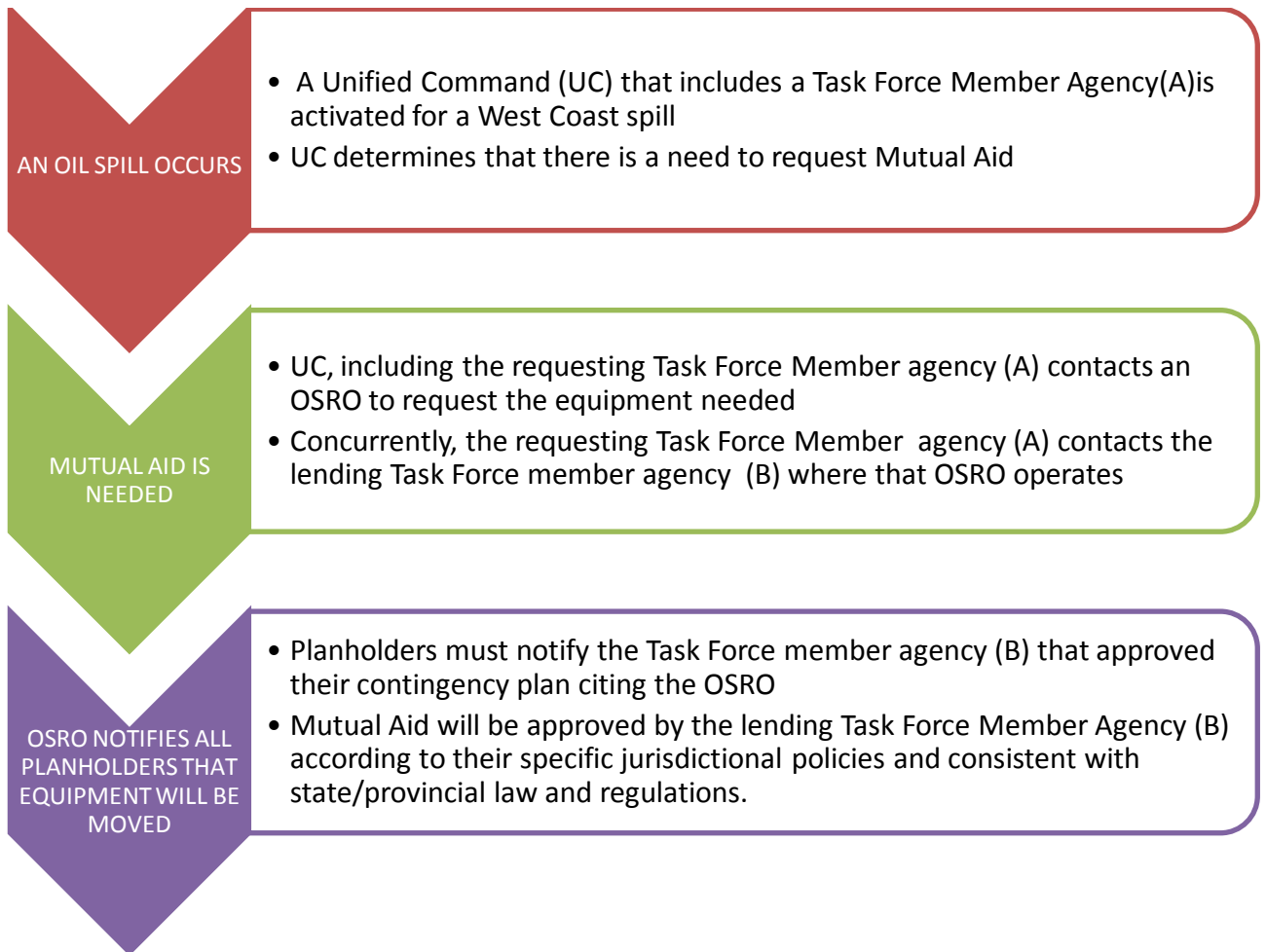
Federal Spill Response Equipment Inventory – Federal agencies, including but not limited to the Coast Guards, Navies, Environment Canada, and the US Environmental Protection Agency, should identify public sector response equipment which could be made available to either “backfill” for private response systems which have left an area for purposes of mutual aid, or which could be cascaded directly to a spill incident.

International Transboundary Spills – A number of issues of concern regarding international transboundary spills were listed in Appendix B of the original 1996 Mutual Aid Agreement; these included differences in liability exposure for response organizations, customs and immigration rules, use of Canadian or U.S. flag response vessels in each other’s waters, worker safety training, use of volunteers, oily waste disposal, response funding, and response command structures. Since the 1996 Agreement was signed, the Task Force successfully advocated for amendments to the U.S. Jones Act which allows Canadian flag vessels to be used for response in U.S. waters (contingent on reciprocal waivers in Canada, which do exist). The Task Force also undertook – with the help of a Stakeholder Workgroup – a comprehensive review of the status of marine oil spill planning and response capacity on both the CANUSDIX and CANUSPAC borders in our region. The U.S./Canada Transboundary Project Report, published in April of 2011, addresses over 36 topics, including those listed above, and offers recommendations for improvements that we endorse.

Other States and Provinces – This Agreement should be forwarded to other states and provinces for their review and consideration. Interested states and provinces should be encouraged to become parties to a similar Agreement.

Appendix A

MUTUAL AID FLOW CHART



APPENDIX B

PREVENTION and RESPONSE PREPAREDNESS MEASURES

The prevention and response preparedness measures listed below are examples of strategies to minimize the risk of oil spills. These measures are examples only and may be implemented on a case-by-case basis as each Task Force Member Agency works with plan holders affected by the movement of response equipment for the purpose of mutual aid.

Task Force Member Agencies

- Should spills occur in areas where equipment has been released under this mutual aid agreement, agencies must be prepared to ensure access to other industry contractors if necessary (through federal basic ordering agreements, existing or under other authority, as it exists).
- Increase the frequency of inspections of equipment readiness as well as the monitoring of operations
- Agencies must be prepared to approve the temporary movement of equipment in excess of planning standards from one area to another as a backfill measure

Facilities and Vessels

- Undertake preventative booming during oil transfers
- Temporary mutual aid agreements with other companies or short term contracts with other response organizations
- Add personnel during bunkering and lightering operations

Facilities

- Upgrade facility awareness and have response teams on-scene during all oil transfers
- Make all facility personnel aware of the company's increased liability position
- Move the facility's response equipment closer to the transfer area and alert local response contractors to be on stand-by
- Adopt procedures to access additional response resources if needed
- Put facility response teams on stand-by
- Pre-stage additional equipment
- Take additional precautionary measures during oil transfers

Vessels

- Add tug escorts
- Transfer only during daylight hours
- Adopt weather restrictions for operations
- Implement the Oil Spill Task Force's Voluntary Best Industry Practices for Oil Spill Prevention