**Spills Prevention, Preparedness, and Response Program**

**WAC 173-182 CONTINGENCY PLAN**

**REVIEW CHECKLIST**

**Plan Name:** Click here to enter text.

**Name & Address:** Name of Signatory

 Company Name

 Address

 City, State, ZIP

**Date Submitted:** Click here to enter text.

**Oil Spill Preparedness Planner:** Click here to enter text.

**Date Review Completed:** Click here to enter text.

The purpose of this Plan Review Checklist is to guide Ecology in the review of a 5-year plan update to an oil spill contingency plan to ensure the plan meets the requirements established under Chapter 173‑182 Washington Administrative Code (WAC).

In order to complete this review, Ecology will consider requirements established in state law, state regulation, and the Northwest Area Contingency Plan; information contained in approved Primary Response Contractor (PRC) applications, Spill Management Team (SMT) applications, Wildlife Response Service Provider (WRSP) applications, and equipment and resources listed on the Worldwide Response Resource List (WRRL). Ecology will also consider public comments solicited through a required 30-day public review period.

To be considered for approval, the oil spill contingency plan must demonstrate that, when implemented, the company/organization can, to the maximum extent practicable, provide for a rapid, aggressive and well-coordinated response to, and cleanup of, a variety of spills including small chronic spills and worst case spills. Each plan should also demonstrate the ability to promptly and properly protect the environment from damage resulting from an oil spill.

**PUBLIC REVIEW: *This is a 5-year update.*** *Comments may be provided on content of the entire plan. During this 30-day period, Ecology reviews the plan using this plan review checklist. At the close of the 30-day public comment period, Ecology considers any comments received and makes a decision to approve, deny, or conditionally approve the plan. Upon conditional approval, the completed checklist detailing which items are still required is made available to the public. When updates to the plan are received and Ecology determines that the items on the checklist have been satisfied, the plan may be made available for an additional 30-day public review before Ecology makes the final decision to approve the plan.*

***Note: Several items on this checklist are comprehensive. For these items, the larger checkbox is not checked unless all of the smaller items are checked.***

**Instructions for Plan Review**

* Checklist items that only apply to a specific plan holder type are highlighted in blue. For a final review, all credit items will be left in and the N/A box will be checked if it does not apply to the plan under review.

FORMAT: WAC 173-182-210

**YES** [ ]  **NO** [ ]  **Plan is formatted appropriately including:**

[ ]  Table of contents with numbered and tabbed chapters.

[ ]  WA-specific information or WA Annex.

[ ]  Replaceable pagination.

**YES** [ ]  **NO** [ ]  **The plan is functionally usable in responding to a spill.**

**Comment:** Enter section comment or type N/A

PLAN UPDATES & SIGNIFICANT CHANGES TO APPROVED PLANS: WAC 173-182-140 & 142

YES [ ]  NO [ ]  Plan contains procedures for updates including commitments to:

[ ]  Provide 24-hour notice to Ecology of temporary or permanent significant changes.

[ ]  Update the plan to reflect permanent changes to the plan within 30 days.

[ ]  Conduct an annual review of the plan. Update and submit the amended plan to Ecology for review and approval; or, send a letter confirming the existing plan is accurate.

Comment: Enter section comment or type N/A

POST-SPILL REVIEW AND DOCUMENTATION PROCEDURES: WAC 173-182-150

YES [ ]  NO [ ]  Plan contains post-spill review and documentation procedures which include a commitment to conduct debriefs with Ecology and other participating agencies and organizations.

Comment: Enter section comment or type N/A

BINDING AGREEMENT: WAC 173-182-220

**YES** [ ]  **NO** [ ]  **Plan contains a binding agreement signed by person(s) with the authority to bind the owners and operators to the plan.**

[x]  **Plan is submitted by**

[ ]  An authorized owner, or operator, or a designee with authority to bind the owners and operators of the facilities or vessels covered by the plan.

[ ]  An authorized representative(s) of a nonprofit corporation established to provide oil spill contingency plan coverage.

[ ]  An authorized resident agent of the vessel(s) submitting the plan.

[ ]  An authorized representative(s) of a company contracted to the vessel or facility and approved by Ecology to provide containment and clean-up services.

[x]  **Plan contains Ecology’s binding agreement form** [**ECY 070-612**](https://fortress.wa.gov/ecy/publications/SummaryPages/ECY070612.html)**.**

Or,

[ ]  **An equivalent binding agreement that includes:**

[ ] The name, address, phone number, email address, and website of the submitting party.

[ ]  Acceptance of the plan and commitment to a safe and immediate response to spills and to substantial threats of spills that occur in, or could impact Washington waters or Washington's natural, cultural and economic resources.

[ ]  Commitment to having an incident commander in state within six hours after notification of the spill.

[ ]  Commitment to the implementation and use of the plan during a spill and substantial threat of a spill, and to the training of personnel to implement the plan.

[ ]  Verification of authority and capability to make necessary and appropriate expenditures in order to implement plan provisions.

[ ]  Commitment to working in Unified Command within the incident command system to ensure that all personnel and equipment resources necessary to the response will be called out to clean up the spill safely and to the maximum extent practicable.

**Comment:** Enter section comment or type N/A

GENERAL PLAN CONTENT: WAC 173-182-230 (2)(3)(a)(c)(d)

YES [ ]  NO [ ]  Plan contains a reference to and is consistent with the Northwest Area Contingency Plan (NWACP).

YES [ ]  NO [ ]  Plan contains a list of the federal and/or state requirements intended to be met by the plan.

YES [ ]  NO [ ]  Plan contains a log sheet to document revisions and updates to the plan.

YES [ ]  NO [ ]  Plan contains a complete cross reference table reflecting the locations in the plan specific to Washington requirements.

**Comment:** Enter section comment or type N/A

CONTRACTED RESOURCES: WAC 173-182-230(3)(e)

Primary Response Contractor (PRC)

[ ]  **N/A Plan does not rely on a PRC to meet applicable planning standards.**

**YES** [ ]  **NO** [ ]  **Plan indicates use of PRC(s) to meet applicable planning standards.**

**YES** [ ]  **NO** [ ]  **Plan contains the required PRC information including:**

[ ] Name, address, 24-hour phone number phone number or other means of 24-hour contact.

[ ] A contract or letter summarizing the terms of the contract and signed by the PRC.

[ ]  If the contract is not in the plan, a commitment that the contract will be made available to Ecology upon request.

Spill Management Team (SMT)

[ ]  **N/A Plan does not rely on a contracted SMT to meet applicable planning standards.**

**YES** [ ]  **NO** [ ]  **Plan indicates use of a contracted SMT to meet applicable planning standards and details what roles the SMT may fill on behalf of the plan holder.**

**YES** [ ]  **NO** [ ]  **Plan contains the required SMT information including:**

[ ] Name, address, 24-hour phone number phone number or other means of 24-hour contact.

[ ] A contract or letter summarizing the terms of the contract and signed by the SMT.

[ ]  If the contract is not in the plan, a commitment that the contract will be made available to Ecology upon request.

**Wildlife Response Service Provider (WRSP)**

[ ]  **N/A Plan does not rely on a contracted WRSP to meet applicable planning standards.**

**YES** [ ]  **NO** [ ]  **Plan indicates use of a WRSP to meet applicable planning standards.**

**YES** [ ]  **NO** [ ]  **Plan contains the required WRSP information including:**

[ ] Name, address, 24-hour phone number phone number or other means of 24-hour contact.

[ ] A contract or letter summarizing the terms of the contract and signed by the PRC.

[ ]  If the contract is not in the plan, a commitment that the contract will be made available to Ecology upon request.

**Comment:** Enter section comment or type N/A

MUTUAL AID AGREEMENTS: WAC 173-182-230(3)(e)(iii)

[ ]  **N/A Plan does not indicate use of Mutual Aid Agreement to meet applicable planning standards.**

YES [ ]  NO [ ]  Plan indicates a Mutual Aid Agreement which is needed to meet applicable planning standards

[ ]  Includes a copy of the current agreement.

[ ]  The terms of the agreement are described in the plan.

**Comment:** Enter section comment or type N/A

PROCEDURES TO TRACK AND ACCOUNT FOR RECOVERED OIL AND WASTE: WAC 173-182-230(3)(f)

**YES** [ ]  **NO** [ ]  **Plan contains procedures to track and account for:**

[ ]  Entire volume of oil recovered.

[ ]  Oily waste generated and disposed of during spill.

**YES** [ ]  **NO** [ ]  **Plan contains:**

[ ]  Forms to account for recovered oil and waste.

[ ]  A commitment to provide records to Ecology upon request.

[ ]  Link to the WA state specific NWACP disposal plan in Section 9405, or reference, or the plan contains a disposal plan template consistent with the NWACP.

**Comment:** Enter section comment or type N/A

ADDITIONAL FACILITY/PIPELINE CONTENT: WAC 173-182-230(4)

[ ]  N/A This is not a facility or pipeline plan.

**YES** [ ]  **NO** [ ]  **Plan contains the following facility specific information:**

[ ]  Name, location, type, and address of the facility.

[ ]  Starting date and description of operations.

[ ]  Description of oil handling operations that occur at the facility.

[ ]  Pipeline inventory with routes and pipeline capacities.

[ ]  Tank inventory with tank capacities.

[ ]  A list of oil products handled by name with density, specific gravity, API, oil group number (1-5), and sulfur content. This can be in table format.

[ ]  Written description and maps of the facility that includes topography, storm water and other drainage systems, mooring areas, pipelines, tanks, oil processing areas, storage, and transfer sites.

[ ]  A description of the geographical area that could be impacted from a worst case spill at the location(s) using a 48-hour trajectory.

[ ]  For pipelines, a narrative describing how the response zone in the plan was identified.

**Comment:** Enter section comment or type N/A

ADDITIONAL VESSEL CONTENT (Except plans covering multiple vessels with different owners): WAC 173-182-230(5)

[ ]  N/A This is not a vessel plan.

YES [ ]  NO [ ]  Plan contains the following vessel specific information:

[ ]  Name of each vessel covered under the plan.

[ ]  Name, location, and address of the owner or operator.

[ ]  Official identification code (IMO number), or call sign.

[ ]  Country of registry.

[ ]  All ports of call or areas of expected operation in Washington waters.

[ ]  List all oil(s) or product(s) by name and include; density, gravity, API, oil group number, sulfur content (sweet/sour) and general ship capacity for amounts carried as cargo or fuel.

[ ]  Description of the operations covered by the plan (i.e. bunkering, lightering, or other over-water transfers).

[ ]  A diagram indicating cargo, fuel, and ballast tanks and piping, power plants, and other oil storage and transfer sites and operations.

**Comment:** Enter section comment or type N/A

ADDITIONAL MULTI-VESSEL PLAN CONTENT: WAC 173-182-230(6)

[ ]  N/A This is not a multi-vessel plan.

YES [ ]  NO [ ]  Plan demonstrates the maintenance of a vessel enrollment list in an acceptable format and made accessible to Ecology on a 24-hour daily basis. List must be updated at least every three days. Vessel enrollment list must include:

[ ]  Name and vessel type for each vessel covered under the plan.

[ ]  Worst case discharge oil type and quantity.

[ ]  The name and API gravity of the densest oil handled on the enrolled vessels.

[ ]  Vessel Agent.

[ ]  Name of SMT(s) for each vessel enrolled under the plan.

[ ]  Name of Protection & Indemnity Club.

YES [ ]  NO [ ]  Plan contains information on the vessels covered by the plan including the following information:

[ ]  A list of the types of vessels.

[ ]  Typical oil type by group and volume carried by the types of vessels covered by the plan.

[ ]  The worst case discharge volume for each planning standard area applicable to the plan.

[ ]  The procedure for the plan holder to acquire vessel diagrams when asked by Ecology.

YES [ ]  NO [ ]  Plan contains a commitment to provide the following information if requested:

[ ]  Vessel diagrams indicating cargo, fuel, ballast tanks, piping, power plants, and other oil storage.

YES [ ]  NO [ ]  Plan describes typical vessel operations in Washington for the vessels enrolled.

**Comment:** Enter section comment or type N/A

ADDITIONAL UMBRELLA PLAN CONTENT: SUPPLEMENTAL RESOURCES: WAC 173-182-230(7) & 232

[ ]  N/A This is not an Umbrella plan, or the Umbrella plan does not indicate use of supplemental resources.

YES [ ]  NO [ ]  Plan indicates the use of supplemental resources as a means to provide coverage to vessels with a worst case spill volume that exceeds the capability of directly contracted resources.

YES [ ]  NO [ ]  Umbrella Plan holder maintains an enrollment list that includes the name of the primary response contractor that will provide supplemental resources for enrolled members.

YES [ ]  NO [ ]  Plan contains documentation of the supplemental resources agreement between the vessel owner/operator and another PRC.

YES [ ]  NO [ ]  Documentation of supplemental resource agreement(s) may include:

[ ]  Authorization for the umbrella plan holder to activate the supplemental agreement, sufficient to meet the worst case discharge of the covered vessel, during a drill, spill, or substantial threat of a spill. This enrollment form may be used to secure this documentation.

**AND**

[ ]  Commitment letter from qualified individuals. Or,

[ ]  Commitment letters from insurance representatives or vessel agents. Or,

[ ]  Include member signed enrollment agreements or other letters of intent or include a statement that the documentation will be made available to ecology upon request.

YES [ ]  NO [ ]  Plan describes the process for the activation of supplemental resources including:

[ ]  Contact information for the supplemental resources provider.

[ ]  Activation directions.

[ ]  How coordination with the vessel QI and primary PRC occurs.

**Comment:** Enter section comment or type N/A

CLAIMS PROCEDURE: WAC 173-182-230(8)

**YES** [ ]  **NO** [ ]  **Plan contains concise procedures to establish a process to manage oil spill liability claims of persons or property, including:**

[ ]  Identification of group/individuals responsible for managing claims.

**Comment:** Enter section comment or type N/A

FIELD DOCUMENT (FACILITY): WAC 173-182-240, WAC 173-182-264 and WAC 173-182-350

[ ]  N/A This is not a facility plan.

**YES** [ ]  **NO** [ ]  **Plan contains a field document that contains time critical information for field staff use during the initial emergency phase of a spill.**

**To ensure field document is appropriately interrelated with the plan, the plan must include:**

[ ]  Locations where the field document is located for use by field staff, e.g., in specific offices, vehicles, etc.

**To ensure the plan is appropriately interrelated with the field document, the field document must include:**

[ ]  Procedures and equipment used to detect, assess and document the size of a spill and forms for documenting initial response assessment, procedures for safety assessment of the spill by trained crew and how appropriate air monitoring is planned for.

[ ]  A prioritized call down list with names and phones numbers of required notifications that field staff must complete when a spill is discovered.

[ ]  A checklist that identifies steps to initiate an appropriate response to the spill.

[ ]  A form to document notifications.

[ ]  Guidance for field staff to identify spills to ground including notification procedures.

**Comment:** Enter section comment or type N/A

VESSEL FIELD DOCUMENT: WAC 173-182-240, 260, 262, and 264

[ ]  N/A This is not a vessel plan.

**YES** [ ]  **NO** [ ]  **Plan contains a field document that contains time critical information for use during a spill or substantial threat of a spill.**

**To ensure field document is appropriately interrelated with the plan, the plan must include:**

[ ] Locations where the field document is located for use by field staff, e.g., in specific offices, location on a ship, etc.

[ ] Identification of a central reporting office/individual for implementing the notification process.

[ ]  A prioritized call down list with names and phones numbers of required notifications to government agencies, response contractors, and spill management team members for spills.

[ ]  A form to document notifications.

[ ]  If the portion (personal phone numbers) of the list is not included in the plan, a commitment to provide the list to Ecology upon request and demonstrate it in drills.

[ ]  Guidance for determining and instructions for reporting vessel incidents that poses a substantial threat of a spill, i.e., vessel emergency.

[ ]  Procedures to activate and call out the ERTV (if applicable).

[ ]  Procedures to detect, assess and document the size of a spill and forms for initial response assessment. (See initial response actions below)

[ ]  A checklist with steps to initiate an appropriate response to the spill.

**Comment:** Enter section comment or type N/A

FIELD DOCUMENT (multi-vessel checklist): WAC 173-182-240

[ ]  N/A This is not a multi-vessel plan.

YES [ ]  NO [ ]  Plan contains a field document that contains time critical information for vessel crew to use during the initial emergency phase of a spill or threat of a spill.

**To ensure field document is appropriately interrelated with the plan, the plan must include:**

[ ]  Procedures to ensure each covered vessel is provided the field document prior to entering Washington waters.

[ ]  The location where the field document is to be kept on the vessel (e.g., in bridge of ship, etc.)

**To ensure the plan is appropriately interrelated with the field document, the field document must include:**

[ ]  A prioritized call down list with names and phones numbers of required notifications that a vessel crew must complete when a spill or threat of a spill is discovered.

[ ]  Notification placard that is to be placed on the bridge of each ship that describes notification procedures for activating the plan.

[ ]  Guidance for reporting vessel incidents or emergencies that pose a substantial threat of a spill.

[ ]  Procedures and equipment to detect, assess, and document the size of a spill and forms for initial response assessment.

[ ]  A checklist with steps to initiate an appropriate response to the spill, listed in a logical progression of response activities.

[ ]  Procedures to activate and call out the ERTV (or ERTV is not applicable).

[ ]  A form to document notifications.

**Comment:** Enter section comment or type N/A

REQUIREMENTS FOR VESSEL OPERATORS WITH ACCESS TO EMERGENCY RESPONSE TOWING VESSEL: WAC 173-182-242

[ ]  N/A This is not a vessel plan, or the vessels covered by the plan do not transit through the Strait of Juan de Fuca.

YES [ ]  NO [ ]  The vessels covered by the plan transit through the Strait of Juan de Fuca. The plan includes required information for contracting with the ERTV:

[ ]  Documentation of contracted access to the ERTV at Neah Bay.

[ ]  Detailed information about the ERTV’s capabilities.

[ ]  Circumstances that may lead to activation and the process for call out of the ERTV.

**Comment:** Enter section comment or type N/A

INITIAL RESPONSE ACTIONS: WAC 173-182-250

YES [ ]  NO [ ]  Plan contains specific initial response actions and forms that will be used to document the response including:

[ ]  Initial spill assessment and site safety forms used to document initial spill actions.

[ ]  A description of equipment used to conduct an initial spill assessment during darkness and low visibility conditions such as:

[ ]  Visual methods, tracking buoys, trajectory modeling, aerial overflights, thermal, and/or infrared imagery.

[ ]  A description of how site safety is assessed for all types of spills, including spills to groundwater:

[ ]  Initial air monitoring protocols and equipment.

[ ]  Procedures used to confirm the occurrence, and estimate the quantity and nature of the spill.

[ ]  Commitment to update the initial report if the estimated quantity or extent of the contamination changes significantly.

**Comment:** Enter section comment or type N/A

NOTIFICATION AND CALL OUT PROCEDURES: WAC 173-250(1); 173-182-260 and 264 (for facilities)

**YES** [ ]  **NO** [ ]  **Plan contains spill notification and call-out procedures including:**

[ ]  Procedures for notifications including a form to document notifications.

[ ]  Procedures must establish a clear prioritized call down list with names and phones numbers of required immediate notifications to government agencies, response contractors, and spill management teams.

[ ]  Immediate notification of the Washington State Emergency Management Division and National Response Center is included.

[ ]  If portions of the notification list, such as internal company notifications, are not included in the plan there must be commitment that the notification documents is available for review by ecology.

**Comment:** Enter section comment or type N/A

VESSEL NOTIFICATION REQUIREMENTS FOR A DISCHARGE OR SUBSTANTIAL THREAT OF A DISCHARGE: WAC 173-182-262

[ ]  N/A This is not a vessel plan.

YES [ ]  NO [ ]  Plan contains discharge or substantial threat of discharge (vessel emergency) information, including:

[ ]  Vessel procedures include directions to notify WEMD within one hour of a discharge or substantial threat of a discharge *or as soon as is feasible* without further endangering the vessel or personnel.

[ ]  Procedures the vessel is to follow to coordinate with the State of Washington, the United States Coast Guard, and the plan holder to protect resources.

[ ]  Procedures the vessel is to follow to implement the contingency plan as described in the plan.

**Comment:** Enter section comment or type N/A

FACILITY SPILLS TO GROUND/CONTAINMENT THREATENING WATERS OF STATE: WAC 173-182-264

[ ]  N/A This is not a facility plan.

YES [ ]  NO [ ]  Plan contains procedures to assess whether spills to ground or permeable secondary containment could threaten waters of the state.

[ ]  Plan describes procedures for assessment using the considerations listed in the regulation, WAC 173-182-264 (1)(a) and (b).

[ ]  Assessment for spills of unknown volume should include at a minimum:

[ ]  Whether the spill is still on-going or source is secured.

[ ]  Whether the spill is located adjacent to waters of the state, or there is a pathway to waters of the state, and

[ ]  Whether the environmental conditions, such as rain events, or known shallow groundwater make impacts to waters of the state likely.

**Comment:** Enter section comment or type N/A

MAINTENANCE RECORDS FOR PLAN HOLDER OWNED RESPONSE EQUIPMENT: WAC 173-182-270

N/A [ ]  Plan holder does not own response equipment.

**YES** [ ]  **NO** [ ]  **Plan contains schedules, methods and procedures for equipment maintenance including:**

[ ]  Plan includes a plan holder-owned equipment list or description, or maintains the list on the WRRL.

[ ]  Plan describes the schedule, method, and procedure for inspecting and conducting maintenance on response equipment, and the personnel responsible for ensuring resources are maintained and have the ability to commit funds for repair or replacement

[ ]  Commitment to maintaining records for a period of five years and to make records available to Ecology upon request.

[ ]  A site visit and equipment inspection occurred on \_\_\_DATE\_\_\_

or is planned to occur after the plan approval.

**Comment:** Enter section comment or type N/A

SPILL MANAGEMENT TEAM (SMT): WAC 173-182-280

**YES** [ ]  **NO** [ ]  **Plan contains SMT information consistent with the Incident Command System and Northwest Area Contingency Plan including:**

[ ]  An organizational diagram depicting the chain of command for the spill management team for a worst case spill. This could be a reference to the NWACP.

[ ]  For the purpose of ensuring depth of the spill management team, a table detailing the names of personnel (or the name of an approved contracted SMT) to fill the ICS roles as specified in the table in WAC 173-182-280 (1)(b)

[ ]  A job description for each spill management position, or a reference to the Incident Management Handbook with position descriptions.

[ ]  A detailed description of the planning process that will be used to manage the spill or reference to the Incident Management Handbook that will be used.

[ ]  Commitment to be able to provide a Primary and two alternate Incident Commanders that can form a Unified Command at the initial command post. The IC must be able to arrive in state within six hours of notification.

[ ]  Narrative description of estimated timeframes for arrival of the rest of the spill management team in state.

[ ]  Commitment to work in Unified Command within ICS.

[ ]  Detailed transition procedures for orderly transition of initial response team to regional or away teams, including shift changes.

[ ]  Detailed training program including training type and frequency provided for each SMT member. A combination of training and experience in drills and spills may be used to describe SMT personnel capabilities within response roles. Training details may be organized by position or may be an inventory of staff training levels and must include:

[ ]  ICS training type and frequency.

[ ]  NWACP content and policies.

[ ]  Use and location of GRPs.

[ ]  Contents of the Contingency Plan.

[ ]  Worker health and safety.

**Comment:** Enter section comment or type N/A

**PLANS COVERING MULTIPLE VESSELS MAINTAIN CONTRACTED ACCESS TO APPROVED SMT OR IN-HOUSE TEAM: WAC 173-182-280(6)**

[ ]  N/A This is not a multi-vessel plan.

YES [ ]  NO [ ]  The plan includes required information for enrolled vessels contracting with a state-approved SMT or in-house team:

[ ]  Describe the transition process from plan personnel to the incoming vessel owner or operator's team.

[ ]  Include checklists and process to facilitate an effective transition.

[ ]  Enrollment process and vessel enrollment list includes information on SMTs for enrolled vessels.

[ ]  Plan holders must notify Ecology immediately of any significant changes to their SMT.

**Comment:** Enter section comment or type N/A

FACILITY PLANNING STANDARDS FOR NON-DEDICATED WORKBOATS AND OPERATORS: WAC 173‑182‑315

[ ]  N/A This is not a facility plan.

YES [ ]  NO [ ]  Plan describes a procedure to support a worst case spill response with work boats and operators that could arrive beginning at 48 hours.

[ ]  Includes discussion about using non-dedicated workboats to help deploy GRPs**,** enhance skimming, and/or to provide logistical support during a spill. *Can refer to the contracted PRC application.*

Comment: Enter section comment or type N/A

VESSELS – PLANNING STANDARD FOR VESSELS OF OPPORTUNITY (VOO): WAC 173-182-317

[ ]  N/A This is not a vessel plan.

YES [ ]  NO [ ]  Plan demonstrates access to appropriate number of VOOs for the area of operations.

[ ]  Plan lists the VOO regions in which they transit or operate.

[ ]  Contracts with a PRC to meet the standard and plan includes a contract or letter from the PRC summarizing coverage. The plan references the PRC application and/or the WRRL for details about the VOO vessels and the training and management of contracted VOO.

**OR;**

[ ]  Plan holder meets the standard with non-PRC assets, which are fully described in the plan and listed on the WRRL.

YES [ ]  NO [ ]  Plan contains procedures for call out and deployment of VOO.

**Comment:** Enter section comment or type N/A

FACILITY PLANNING STANDARDS FOR AERIAL SURVEILLANCE: WAC 173-182-320

[ ]  N/A This is not a facility plan.

**YES** [ ]  **NO** [ ]  **Facility planning standards for aerial surveillance is assessed and indicates:**

[ ]  Aerial tracking resources are identified in the plan, including types and call out information, and could be on-scene within six hours of the spill notification.

[ ]  Resources are capable of supporting operations for 3 ten-hour periods during the initial 72 hours of the spill.

**OR**;

[ ]  Contracts with a PRC to meet the standard and plan includes a contract or letter from the PRC summarizing coverage. The plan may reference the PRC application for additional operational details.

**Comment:** Enter section comment or type N/A

VESSEL PLANNING STANDARDS FOR AERIAL SURVEILLANCE: WAC 173-182-321

[ ]  N/A This is not a vessel plan.

YES [ ]  NO [ ]  Covered vessel planning standards for aerial surveillance is assessed and indicates:

[ ]  Name of aerial surveillance resource provider and description of logistical resources.

[ ]  Contracts with a PRC to meet the standard and plan includes a contract or letter from the PRC summarizing coverage. The plan may reference the PRC application for additional operational details.

[ ]  Plan meets best achievable technology requirements in WAC 173-182-321(3), including access to approved aircraft with low-visibility equipment suite.

**Comment:** Enter section comment or type N/A

PLANNING STANDARDS FOR OILS THAT MAY SUBMERGE OR SINK: WAC 173-182-324

[ ]  N/A Plan indicates oils that may weather and sink when spilled to the environment are not carried, handled, stored, or transported, and therefore planning standard is not applicable.

YES [ ]  NO [ ]  The plan holder or contracted PRC has necessary personnel and equipment capability within the time frames outlined in WAC 173-182-324. The contract or a summary of the contract terms are included in the plan.

YES [ ]  NO [ ]  Plan describes:

[ ]  A detailed process for identification if the oil has a potential to submerge or sink.

[ ]  A description of the process for detecting, delineating, and recovering non-floating oils in the areas that may be impacted. The plan can reference the non-floating oil tools and processes found in the NWACP.

**Comment:** Enter section comment or type N/A

PLANNING STANDARDS FOR DISPERSANTS: WAC 173-182-325

YES [ ]  NO [ ]  Plan Holder carries, handles, stores, or transports Group 2, 3, or 4 persistent oil that is known to be dispersible and that may impact any area where preapproval or case-by-case use of dispersants is available as per NWACP Section 9406.

[ ]  N/A If yes, the plan must include:

[ ]  A description of the capability for the use of dispersants including an acknowledgement of the NWACP use of dispersant policies, and a commitment to monitor the efficacy of its use.

**AND;**

**The plan refers to a contract with a PRC with operational dispersant capability and includes a contract or letter summarizing coverage, signed by a current authorized representative of the PRC.**

[ ]  A description of dispersant stockpiles, type, and capability.

[ ]  A description of how the equipment will be transported to the staging area and the appropriate vessels or aircraft resources to apply the dispersant and monitor its effectiveness at the scene.

[ ]  Resources are capable of being on-scene within 12 hours of notification.

**OR;**

[ ]  Plan holder refers to the approved PRC application for detail on their dispersant capability and operational plan.

**Comment:** Enter section comment or type N/A

PLANNING STANDARDS FOR IN-SITU BURNING: WAC 173-182-330

YES [ ]  NO [ ]  Plan holder operates in an area where in-situ burning (marine and/or inland) may be considered as a response option based on NWACP Section 9407.

[ ]  N/A If yes, the plan must include:

[ ]  Location of two 500-foot fire booms, air monitoring equipment, personal protective equipment, igniters, and aircraft or vessels used to deploy the igniters.

[ ]  Demonstrated access to an additional 1,000 feet of conventional boom, towing bridles, and workboats capable of towing boom in on-water burning operations.

[ ]  Description of how the equipment will be transported to the staging area and appropriate vessels and aircraft, and personnel resources to monitor the effectiveness at the scene.

[ ]  Resources are capable of being on-scene within 12 hours of notification.

[ ]  References the NWACP in-situ burning response tools.

**OR;**

[ ]  Plan refers to PRC with in-situ burn capability (marine and/or inland) capable of meeting the above requirements in accordance with the NWACP in-situ burning response tools. Plan holder refers to the approved PRC application for detail on their in-situ burn capability. Plan includes a contract or letter summarizing coverage and signed by a current authorized representative of the PRC.

**Comment:** Enter section comment or type N/A

PLANNING STANDARDS FOR STORAGE: WAC 173-182-335

YES [ ]  NO [ ]  Plan contains required information on storage tactics, including:

[ ]  On water storage devices.

[ ]  Interim shore-side storage locations.

N/A [ ]  Plan holder does not seek shore-side storage credit.

YES [ ]  NO [ ]  Plan contains information to allow shore-side storage credit including:

[ ]  Permanent shore-side tankage identified. Must include written agreement with owner of tankage being identified.

**Comment:** Enter section comment or type N/A

DETERMINING EFFECTIVENESS OF RECOVERY SYSTEMS AND EFFECTIVE DAILY RECOVERY CAPACITY: WAC 173-182-345 and 348.

☐ N/A Plan holder does not own recovery equipment.

YES [ ]  NO [ ]  Plan provides determination of effective recovery systems and daily recovery capacity for plan holder owned equipment.

Comment: Enter section comment or type N/A

COVERED VESSEL PLANNING STANDARDS FOR TECHNICAL MANUALS: WAC 173-182-349

[ ]  N/A This is not a vessel plan, or the plan holder does not transit Neah Bay, Cathlamet, or San Juan Islands.

YES [ ]  NO [ ]  Plan holder includes a link to a Technical Manual that meets the requirement of 173-182-349.

**Comment:** Enter section comment or type N/A

FACILITY WORST CASE SPILL PLANNING VOLUME: WAC 173-182-030(73) and 230(3)(b)

[ ]  N/A This is not a facility plan.

YES [ ]  NO [ ]  Plan identifies an appropriate worst case spill volume for the facility based on the largest above ground storage tank on the facility site. This includes:

[ ]  Product type most likely for WCS.

[ ]  For multiple facilities using a single plan, separate worst case spill volumes is identified for each facility.

**Worst Case Spill volume is:** Click here to enter text.

YES [ ]  NO [ ]  Plan contains acceptable methodology, including calculations to arrive at the worst case volume.

**Comment:** Enter section comment or type N/A

VESSEL WORST CASE SPILL PLANNING VOLUME: WAC 173-182-030(73) and 230(3)(b)

[ ]  N/A This is not a vessel plan.

YES [ ]  NO [ ]  Plan identifies an appropriate worst case spill volume based on a spill of the vessel's entire cargo and fuel. This includes:

[ ]  Product type most likely for WCS.

[ ]  **Worst Case Spill volume is:** Click here to enter text.

UMBRELLA PLAN WORST CASE SPILL PLANNING VOLUME: WAC 173-182-030(73) and 230(3)(b)

[ ]  N/A This is not an Umbrella plan

YES [ ]  NO [ ]  The Umbrella Plan provides a narrative that details the worst case spill volume, product types, types of vessels, transit areas, ports, and operations covered by the plan.

**Describe here**: ***Click here to enter text.***

 **Comment:** Enter section comment or type N/A

PIPELINE WORST CASE SPILL PLANNING VOLUME: WAC 173-182-030(73) and 230(3)(b)

[ ]  N/A This is not a pipeline plan.

YES [ ]  NO [ ]  Plan identifies an appropriate worst case spill volume, or set of volumes, for the pipeline including:

[ ]  Product type most likely for WCS.

[ ]  **Worst Case Spill volume is:** Click here to enter text.

[ ]  **Pipeline Worst Case Spill is based on one of the following:**

* Location of pump stations.
* Key block valves.
* Geographic considerations.
* Largest break out tank or battery of tanks.

[ ]  **The volume is determined as the largest of the following methodologies, and all methodologies are detailed in the plan:**

* Maximum time to detect release + maximum shutdown response time (minimum of 30 minutes) X maximum flow rate per hour + largest line drainage volume after shutdown.
* Maximum historic discharge from the pipeline.
* Largest single break out tank or battery of tanks.

YES [ ]  NO [ ]  Plan contains acceptable methodology for more than one worst case spill volume for different pipeline sections.

**Comment:** Enter section comment or type N/A

 PLANNING STANDARDS: WAC 173-182-350-450

**YES** [ ]  **NO** [ ]  **Plan references the appropriate planning standard(s) that apply to the plan’s operations:**

**The following planning standards apply to your plan:**

[ ]  Transfer sites for covered vessels at facilities where transfers occur, and for facilities with a vessel terminal - WAC 173-182-355

[ ]  Transmission pipelines that may impact shorelines of statewide significance - WAC 173-182-365

[ ]  Transmission pipeline tank farms - WAC 173-182-366

[ ]  San Juan County - WAC 173-182-370

[ ]  Padilla Bay - WAC 173-182-375

[ ]  Commencement Bay Quartermaster Harbor - WAC 173-182-380

[ ]  Nisqually - WAC 173-182-385

[ ]  Dungeness - WAC 173-182-390

[ ]  Neah Bay Staging Area - WAC 173-182-395

[ ]  Copalis, Flattery Rocks, Quillayute Needles - WAC 173-182-400

[ ]  Grays Harbor - WAC 173-182-405

[ ]  Willapa - WAC 173-182-410

[ ]  Cathlamet Staging Area - WAC 173-182-415

[ ]  Vancouver - WAC 173-182-420

[ ]  Tri-cities - WAC173-182-430

[ ]  Planning Standards for the Washington Coast - WAC173-182-450

YES [ ]  NO [ ]  Planning standard spreadsheets demonstrate adequate boom, storage, and recovery equipment strategically staged to meet the prescribed planning standard timeframes.

**Comment:** Enter section comment or type N/A

RESPONSE AND PROTECTION STRATEGIES: WAC 173-182-510

YES [ ]  NO [ ]  The plan identifies methods to track and contain spilled oil and enhance the recovery and removal operations that are described in the plan.

[ ]  Plan contains land-based strategies to divert, deflect, collect, or block oil movement.

YES [ ]  NO [ ]  The plan includes a description of how environmental protection will occur, including:

[ ]  Commitment to implement GRP strategies as needed to protect environment

[ ]  Discussion of applicable GRPs.

[ ]  Identification of resources at risk, including those on the surface, shoreline, water column and benthic risks—or reference to the applicable GRP(s) with these considerations.

[ ]  Non-floating oil considerations including identification of waterway depths, water density, sediment load, sea floor or river bottom types, and response options based on those factors—or reference to applicable GRP(s) with these considerations.

[ ]  Web link to GRPs.

YES [ ]  NO [ ]  Facility does not impact a sole-source aquifer; or, the plan identifies the aquifer that may be impacted, the types of substrate in the vicinity, and the geographical extent of sensitive sites.

YES [ ]  NO [ ]  GRPs have not been developed to meet this requirement; or, the plan holder describes plan specific response strategies to protect significant sensitive sites. The plan holder must work with Ecology to verify these sites.

YES [ ]  NO [ ]  The plan identifies potential initial command post locations.

**Comment:** Enter section comment or type N/A

GEOGRAPHIC INFORMATION PLANNING STANDARDS FOR PIPELINE PLAN HOLDERS: WAC 173‑182‑515

[ ]  N/A This is not a pipeline plan.

YES [ ]  NO [ ]  Plan includes a narrative that describes the geographic information planning tool that supports the plan holder in mapping and tracking spilled oil, decision making, and enhancing the recovery and removal operations that are described in the plan.

The tool includes the following as applicable for areas which may be impacted by a spill:

[ ]  Pipeline details such as location information for line segments, block valves, break out tanks, containment structures, control stations, safety equipment, pipeline right of way, access points, and pipeline control points.

[ ]  Sensitive natural, cultural, and economic area information including applicable GRPs.

[ ]  Information on public resources, water intakes, sole source aquifers, existing monitoring wells, and drinking water supplies.

[ ]  Topography of the area.

[ ]  Oil spill response equipment staging information.

YES [ ]  NO [ ]  The contingency plan contains a commitment to utilize the tool during drills and spills.

YES [ ]  NO [ ]  The contingency plan contains a commitment to update the tool at a minimum once every five years or in response to lessons learned during drill and spill events.

**Comment:** Enter section comment or type N/A

PLANNING STANDARDS FOR SHORELINE CLEANUP: WAC 173-182-522

YES [ ]  NO [ ]  Plan demonstrates adequate preparation for immediate and prolonged shoreline cleanup operations including access to 100 trained shoreline cleanup workers within 24 hours and additional resources to support 14 additional days of shoreline cleanup work.

[ ]  Plan includes procedures for identifying shoreline types and determining appropriate response tactics, AND

[ ]  Plan describes data collection, communication, transmission, and management for shoreline clean-up assessment techniques, AND

[ ]  Plan refers to a contract with a PRC for shoreline clean-up capability and equipment, and references the applicable PRC application for details about the operational plan capable of meeting the planning standard, OR

[ ]  Plan holder owns and maintains contractors for personnel resources necessary to meet the personnel and equipment requirements, and the plan contains a detailed operational shoreline clean-up plan capable of meeting the planning standard.

**Comment:** Enter section comment or type N/A

FACILITY PLANNING STANDARDS FOR GROUNDWATER SPILLS: WAC 173-182-530

[ ]  N/A This is not a facility plan.

YES [ ]  NO [ ]  Plan includes appropriate description of:

[ ]  Methods used to immediately assess spills that may threaten groundwater.

[ ]  Contact information for resources to be used to investigate, contain, and remediate/recover spills to groundwater.

**Comment:** Enter section comment or type N/A

PLANNING STANDARDS FOR AIR MONITORING TO PROTECT RESPONDERS AND THE PUBLIC: WAC 173-182-535

YES [ ]  NO [ ]  Plan describes applicable federal, state, and local requirements and the plan holder's resources for conducting air monitoring to protect responders and the public, including:

[ ] A description of how initial site safety assessment for responders will occur.

[ ] A description of how work area air monitoring will occur.

[ ] A description of how community air monitoring (area wide monitoring) will occur.

[ ] A description of air monitoring instruments and detection limits that will be used by responders when monitoring for public safety.

[ ]  A description of action levels for various oil constituents of concern (benzene, H2S, etc.) based on products handled.

[ ]  A description of data management protocols and reporting time frames to the Unified Command.

[ ]  A description of communication methods to at-risk populations.

[ ]  A description of how evacuation zones and shelter-in-place criteria are established.

**Comment:** Enter section comment or type N/A

PLANNING STANDARDS FOR WILDLIFE RESPONSE: WAC 173-182-540

YES [ ]  NO [ ]  The plan meets applicable federal, state, and NWACP requirements for response to and care for wildlife injured or endangered by oil spills, including:

[ ] Plan describes how to conduct and manage the various field aspects of a wildlife response including impact assessment, reconnaissance, deterrence, capture, stabilization, and rehabilitation.

[ ] Plan commits to conduct wildlife response actions in accordance with applicable federal and state regulations and the Northwest Area Contingency Plan

[ ] Contact information for approved organizations, available under contract or other approvable means, and that maintain the required equipment, personnel, permits, materials, and supplies, for conducting wildlife response operations in accordance with the capabilities detailed in WAC 173-182-540(2), (3), and (4).

[ ] Access to approved equipment and personnel capable of arriving on-scene at required intervals.

[ ]  Access to approved equipment and personnel to conduct and manage the various field aspects of wildlife response.

**Comment:** Enter section comment or type N/A

ALTERNATIVE METHODS OF EVALUATING PLANNING STANDARDS: WAC 173-182-620

[ ]  N/A Plan does not include a request for an alternative to a planning standard.

YES [ ]  NO [ ]  Plan includes an alternative planning standard that achieves equivalent or higher protection in terms of spill preparedness and response compared to the applicable planning standard. The plan addresses the following:

[ ]  Identifies the planning standard(s) for which alternative will be substituted.

[ ]  Provides a detailed description of the alternative.

[ ]  Provides an analysis for how the proposal will provide equal or greater protection compared to the applicable planning standard.

**Comment:** Enter section comment or type N/A

DRILLS: WAC 173-182-700 through 740

YES [ ]  N/A [ ]  This plan requests an alternative to the drill program.

[ ]  Identifies the requirement for which alternative will be substituted.

[ ]  Provides a detailed description of the alternative.

[ ]  Provides an analysis for how the proposal will provide equal or greater protection compared to the applicable planning standard.

YES [ ]  NO [ ]  Plan commits to Washington’s drill program. Plan includes:

[ ]  A written commitment to schedule drills to satisfy the timing and frequency requirements of WAC 173-182-700 and WAC 173-182-710.

[ ]  Commitment to provide Ecology an opportunity to help design and evaluate all tabletop and deployment drills for which credit is requested.

[ ]  Commitment to update plan if deficiencies are identified during drill performance and evaluation.

[ ]  N/A This is not a multi-vessel plan.

**YES** [ ]  **NO** [ ]  **Plan includes statement committing to working with Ecology to systematically over time test all spill management teams that support your vessel enrollees as required by WAC 173-182-710(3).**

**Comment:** Enter section comment or type N/A

ADDITIONAL NOTES:

Click here to enter text.

**REVIEW:**

As stated under WAC 173-182-910(2), approval does not constitute an express assurance regarding the adequacy of this plan nor does it constitute a defense to liability imposed under state law. Further, in accordance with WAC 173 182 142(2), the Department of Ecology must be notified as soon as possible and within 24 hours of any significant change that could affect implementation of the plan. A schedule for the prompt return of the plan to full operational status must be provided. A facsimile or e-mail will be considered written notice for the purposes of this subsection.

As part of my review of this plan, I received Enter number received comment letters from stakeholders. I have considered these comments in this review.

Based on applicable provisions of Chapter 173-182 WAC, this checklist, and the plan approval criteria found in Washington law, I recommend that the contingency plan for Enter name of plan PLAN be type approved, conditionally approved, or denied.

For full approval to be granted, please provide updates that address all items that have not been checked “Yes” on this checklist within 60 days. If you are unable to meet this deadline, please contact us immediately to discuss an extension.

**Oil Spill Preparedness Planner:** Click here to enter text. **Date:** Click here to enter text.