Workshop Information

- First part of workshop is being recorded (not discussion)
- Slides and recording will be posted to Oil Spill Contingency Plans rulemaking webpage
- All attendees are muted upon entry. Please keep your microphone muted when not speaking to minimize background noise.
- Please use the chat box for general comments
- Use the "Raise Hand" feature if you wish to speak
- If you have technical issues, please private message the host in the chat.

DEPARTMENT OF ECOLOGY
State of Washington

SCAT & UAS Workshop

Spill Prevention, Preparedness, and Response Program

March 18, 2026

Objectives - BAP

- Incorporate Shoreline Cleanup Assessment Technique (SCAT) into current planning standards.
  - SCAT is a methodology for collecting shoreline oiling data & documenting shoreline clean-up recommendations
  - SCAT teams have representatives from all members of unified command, including the responsible party
  - SCAT teams require a coordinator

Workgroup Recommendations

- Establish the use of Shoreline Response Program (SRP) where shoreline cleanup or response is mentioned.
- Update sections of the WAC that describe shoreline cleanup and response to include SCAT.
- Establish a timeline for SRP resources to be available, either in the NWACP or WAC.

Current Language – Vessel, Facility, and Pipeline Plans

WAC 173-182-522 - Planning standards for shoreline cleanup.

(1) Each contingency plan shall include procedures for identifying shoreline types that could be impacted by an oil spill and procedures to determine appropriate response tactics for the potentially impacted shorelines during spills. The plan should describe contracted access to shoreline clean-up workers and shoreline clean-up equipment to ensure the following capability can plan to arrive within twenty-four hours of spill notification:

(a) Plan holders must have contracted access to one hundred trained shoreline clean-up workers. The shoreline clean-up workers must have appropriate safety and Hazwoper training and will not be counted towards other planning standards. The training should enable clean-up workers to safely perform clean-up actions under the direction of the supervisors and the work assignment as developed by the unified command.

(b) Plan holders must have contracted access to trained shoreline clean-up supervisors. Training for supervisors must include safety, Hazwoper, and relevant ICS courses. For planning purposes a ratio of 1:10 supervisors to clean-up workers should be available under contract to the plan holder. The shoreline clean-up supervisors will not be counted towards other planning standards. Supervisors must understand the ICS process and be able to direct workers consistent with the work assignments as developed by unified command.

(c) Plan holders shall have access to adequate equipment for passive recovery for three miles of shoreline on three tide lines. The plan must identify the staging location(s) of the shoreline clean-up equipment.

(d) The plan holder must have access to a shoreline clean-up mobile storage cache that can support eighty to one hundred shoreline clean-up workers with personal protective equipment, hand tools, and other logistical support for three to five days.

(2) Plan holders must describe how data collection, communications, data transmission and data management will be conducted.

(3) The plan shall describe how the plan holder will obtain additional resources necessary to support fourteen additional days of shoreline cleanup. The description should include vendor names, contact information, resources, and approximate time frames for resources to arrive at a staging area.

Current Language – Railroad Plans

WAC 173-186-350 Planning standards for shoreline cleanup.

Each rail plan holder shall identify and ensure the availability of response resources necessary to perform shoreline cleanup operations capable of being on scene within twenty-four hours of spill notification.

Discussion Question: Are there ways to improve the rule to ensure that a shoreline response program can be stood up rapidly during an incident?

- Training standards for shoreline workers? Currently only HAZWOPER.
- Benefit of WAC language vs NWACP? Specify trained SCAT coordinator is available via contract.
- Update 173-182-522 (1)(a) to include SCAT training and drill requirements.

Discussion Question: Are there ways to improve the rule to ensure that a shoreline response program can be stood up rapidly during an incident?

- Differentiate between SCAT team and shoreline cleanup workers.
- Identify the responsibility to manage SCAT program and data availability between RP and agencies.
- Identify NWACP 96-hour plan as a location to clarify the expectations (also not included in the WAC).
- Avoid being overly prescriptive to allow for right-sizing to incident.

Discussion Question: Are there ways to improve the rule to ensure that a shoreline response program can be stood up rapidly during an incident?

- Because WAC requires that contingency plans align with the NWACP, it is another way to add best practices and guidance, so part of this discussion is identifying which document is best to include these recommendations.
- NWACP can be more detailed and updated more often than the WAC. Also applies to all plan holders, not specific to type.
- How will updates to the NWACP be identified during this formal rulemaking process?
- Rule will include updates to Area Plan Framework coming soon (NWACP vs Sector vs Regional plans). WAC updates would be for all, rather than updating individual plans.

Objective - BAP

- Update aerial surveillance requirements to
  - incorporate Uncrewed Aerial Systems (UAS) as an optional response tool in low visibility environments;
  - improve alignment between facility and covered vessel planning standards; and
  - focus rules on desired outcomes and mission objectives rather than specific equipment or sensors.

UAS Workgroup Recommendations

- Consider better aligning the aerial surveillance requirements of WAC 173-182-320 and 173182-321.
- Consider adding language to include UAS use as an optional response tool in low visibility environments (WAC 173-320, 321, 250, 450, and 810).
- Consider adding UAS as an option wherever fixed wing or helicopters are called out.
- Rather than requiring specific equipment or technical capabilities, it would be more appropriate to base regulation around the desired outcomes or mission of the overflight objective (see table).

173-182-250 Initial response actions.

(1) Plan holders and responsible parties are required to document their initial spill actions and the plan shall include the forms that will be used for such documentation.

(2) The plan shall describe what equipment will be used to conduct initial spill assessment, including equipment effective during darkness and low visibility conditions, such as visual methods, tracking buoys, trajectory modeling, aerial overflights, thermal or infrared imagery.

(3) The plan must state how safety assessment including initial air monitoring will be conducted for all types of spills, including spills to groundwater.

(4) The plan must list procedures that will be used to confirm the occurrence, and estimate the quantity and nature of the spill. An updated report is required if the initially reported estimated quantity or the extent of the contamination changes significantly.

173-182-320 Facility planning standards for aerial surveillance.

Each facility plan shall provide for aerial oil tracking resources capable of being on-scene within six hours of spill notification. At a minimum, these resources must be capable of supporting oil spill removal operations for three, ten-hour operational periods during the initial seventy-two hours of the discharge.

173-182-321 - Covered vessel planning standards for aerial surveillance.

(1) Access to a helicopter or fixed wing, under contract or other approved means, that is appropriately located and could have arrived with a trained aerial oil spill spotter (spotter) to those planning standard areas plan holders operate or transit within six hours of spill notification. The contracted asset must have the following capability: ....
(2) Plans must also include logistical sources of additional resources not under contract that may be utilized as additional spotting resources to maximize the effectiveness of enhanced skimming, or as resources to identify the extent of oil to inform shoreline clean-up and assessment teams and shoreline clean-up activities.
(3) In order to provide best achievable technology for aerial oil surveillance, vessel plan holders must also provide for access to a helicopter or fixed wing asset, under contract or other approved means, with the capability to provide a strategic picture of the overall spill; assist in location of slicks when they are not visible by persons operating at, or near, the water's surface or at night; extend the hours of clean-up operations to include darkness and poor visibility; and identify oceanographic and geographic features toward which oil may migrate.

(b) The aerial asset must be equipped with a suite of equipment that could support the capabilities described in this subsection. At least two remote sensing systems must be included in the suite and one of them must be a high definition mounted infrared (IR) camera designed to support aerial operations from aerial platforms. If the IR camera is not mounted, then plan holders must demonstrate how the handheld system will be effective from an aerial platform. Plan holders must submit for approval the systems included in the suite. For the IR camera, the following capability descriptions must be included in the submission:

(i) IR camera with sensors capable in the thermal or mid-IR range;
(ii) A sensor which provides high resolution for airborne imaging;
(iii) Continuous optical zoom capability appropriate for use from an aerial platform;
(iv) Tested minimum thermal resolution and/or the tested minimum resolvable temperature difference; and
(v) Plan holders must submit for review and approval the systems included in the suite. Plan holders may submit for review and approval alternative testing data. This alternative proposal will be subject to a thirty-day public review and comment period which includes, but is not limited to, interested local and tribal governments and other stakeholders.

(c) The trained oil spill aerial observer on board could begin gathering the following from the scene of the spill once on-site:

(i) Graphically displaying processed multispectral data (at a minimum displaying the IR and optical windows), photographic images and other information onto electronic marine charts creating high contrast composite images;
(ii) Ability to reference a map image to a geographic location;
(iii) Location extent and relative thickness information for a reported oil sheen or slick;
(iv) Transmitting processed images and other information to the unified command primary command post;
(v) Archiving all processed data and images; and
(vi) Integrating spill images and other information with spill management software.

(4) Plan holders must have access to personnel trained in aerial surveillance and as spotters to direct skimmers into the thickest oil to enhance on-water recovery and to support the activities described above. The names of individuals with this training, their home base and training levels must either be listed in the plan or made available to ecology upon request. At a minimum, personnel must be trained in aerial observation at the level set forth in federal regulations currently located at 33 C.F.R. 155.1050 (l)(2)(iii). A copy of this regulation is available through ecology upon request.

173-182-450 - Planning standards for the Washington coast.

These standards apply to covered vessels that enter Washington waters at the Columbia River, Grays Harbor or the Strait of Juan de Fuca, and offshore facilities.

Plan holders shall be capable of sustaining a worst case spill response and shall develop an addendum specific to Washington's coast, including:

.....

(2) Surveillance equipment (including fixed wing, helicopters and low visibility equipment) to provide for aerial assessment of spill within six hours of spill notification;

173-182-810 - Content submittal and review of primary response contractor (PRC) applications.

(9) A list of agreements for fixed wing and rotary aircraft used to support spill clean-up operations.

(10) A detailed description of remote sensing equipment and aerial surveillance resources and personnel that the primary response contractor has under contract or letter of intent that could be used to detect and track the extent and movement of oil or direct on-water recovery operations.

Discussion Question: Are there ways to improve the rule to focus on capability rather than technology with aerial systems?

WAC does not preclude drone operations in practice.

Focus on outcomes and capability vs specific types of aircraft.

Since drones are cheaper and easier than helo/fixed wing there is unlikely to be a dearth in supply or use.

Ensure helo and planes are still required in case of need.

Should the requirements for covered vessels apply to facilities, pipelines, and rail? Consistency is helpful.

If drones are added, do not specify equipment - just capability.

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Thank you for attending!

Website	Rulemaking for 173-182 and 173-186
Questions?	SpillsRuleMaking@ecy.wa.gov
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