

Non-Response Vessel Cleaning Plan and Procedures

M/V Cosco Busan

November 18, 2007

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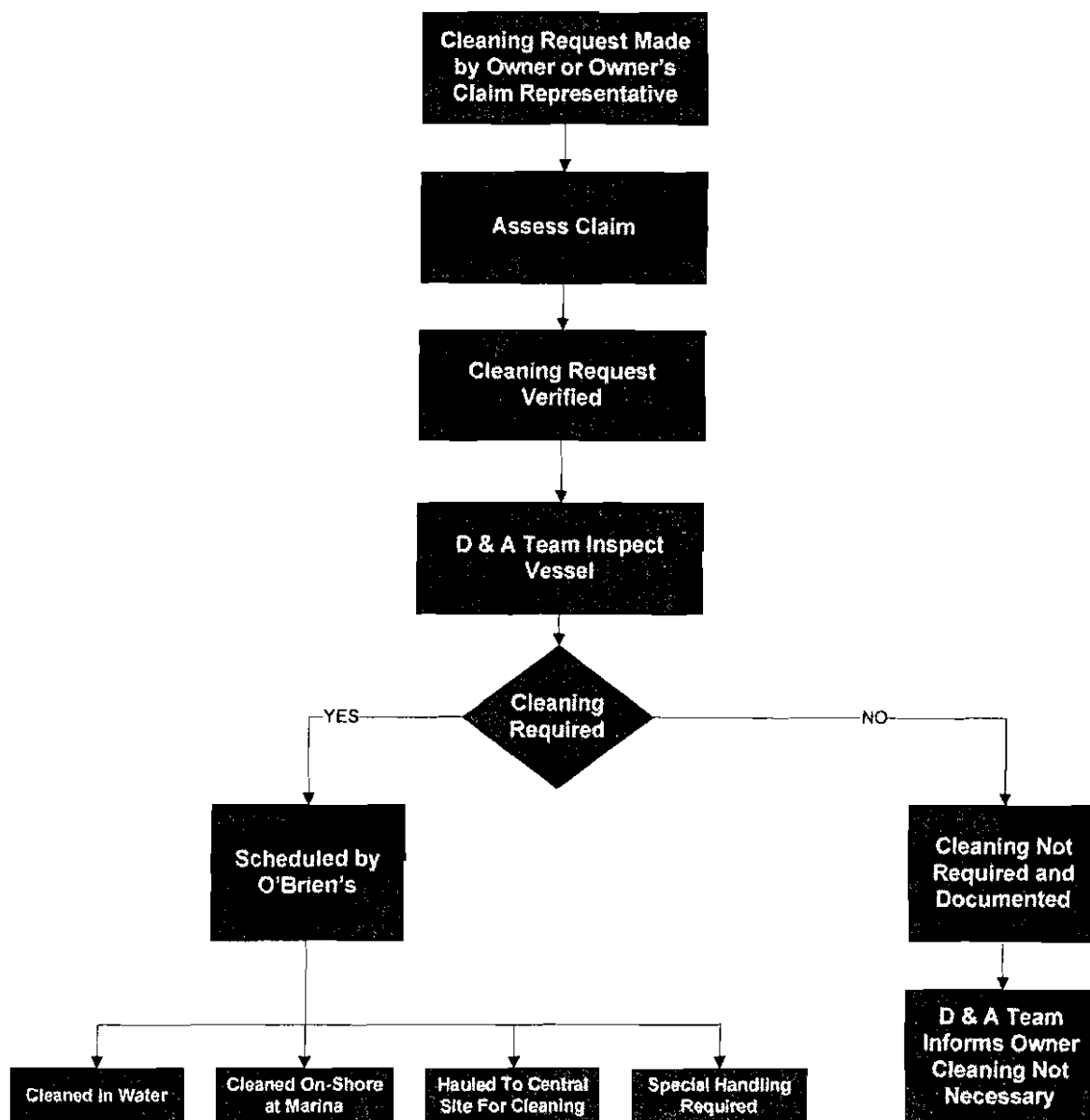
Overview

The November 7 Cosco Busan oil spill has impacted large portions of the San Francisco Bay and areas along the California coastline with fuel oil. Pending cleanup of the oil spill, oil may contact and adhere to boat hulls and cause aesthetic impacts or other damage. Thus, removal of oil from the exterior of vessel's hulls is necessary. This plan is intended to help boat owners prevent further water quality impacts which may result from the cleanup of oil from their vessels.

The Operations Cleaning Procedure for recreational vessels is applicable to multiple facilities that will be set up and utilized at Decontamination Stations, affected marinas, or at individual moorages as necessary. Individual operations will be sized to effectively meet site-specific needs.

Vessels identified as pollution risks will be evaluated and addressed by a *Documentation and Assessment Team* (D&A Team). Vessels not inside marinas where cleaning stations are established will be instructed regarding how to proceed.

Cleaning Request/Scheduling Process Flow Diagram



Request for Cleaning Process

Most requests will be generated from one of two sources. The Owner's Claims Representative (Representative) will advertise the claims phone number, as required by OPA90, in newspapers covering the impacted area. In addition, marinas will be contacted to ensure that they have notified their boat owners of the claims phone number (866-442-9650). Vessel owners requesting cleaning will contact the Representative. The claims processor will issue a number and gather preliminary

contact information. The vessel owner may decide to initiate a claim at this point or have their boat cleaned. If the vessel owner wishes to have their boat cleaned, the Representative will schedule an assessment to be performed by the D&A Team. After the assessment is complete, The O'Brien's Group's contractors will then schedule a date, time and appropriate location to clean the vessel based on scheduling availability and the degree of oiling. At the time of cleaning, The O'Brien's Group will replace miscellaneous accessories such as lines and fenders. The vessel owner will be required to agree to a release of liability following the cleaning. If the vessel owner is satisfied with the cleaning, no further action will be required. If the vessel owner is not satisfied, they will be directed to file a claim.

Vessel Cleaning Options

There are four options for cleaning vessels:

- Option 1: Professional crews will clean the vessel at a cleaning station in an impacted marina. This is the preferred method, as it is expeditious, minimizes owners' exposure to oil, and uses professional crews employing preferred methodologies to minimize environmental impacts. The O'Brien's Group, in consultation with the US Coast Guard and the California Department of Fish and Game, Office of Spill Prevention and Response (OSPR), is in the process of locating and establishing cleaning stations at impacted marinas, where vessels will be cleaned of oil free of charge.
- Option 2: The impacted vessel will be transported to a cleaning station established outside of a marina. Weather-safe areas will be selected to perform the preferred in-water method of cleaning the vessel.
- Option 3: The impacted vessel will be transported to a commercial boatyard or marina for haulout and cleaning onshore.
- Option 4: The impacted vessel's owner will contact the established Decontamination Stations at Pier 96 or the NRCES docks in Alameda for cleaning. This option will only be used in the event that Options 1, 2 and 3 are not feasible. For large vessels (vessels greater than 800 feet), commercial vessels, historical vessels, and other vessels:
 - Crews may be dispatched from the Decontamination Station to service the vessel at its location. This decision will be made on a case-by-case basis.
 - Cleaning of historical vessels will be carried out in consultation with the appropriate authorities.
- Boat owners will not be instructed to clean their own vessels.

Scheduling

The vessel-cleaning schedule can be impacted and limited by tides, currents, and weather conditions. The scheduling of each cleaning operation will be tailored to local conditions and is subject to change. Since operations can be significantly impacted by wind and weather, it is estimated that 8-10 boats can be cleaned during a tide cycle. External factors such as lighting, storage, sanitation facilities, and administrative accommodations will also influence working conditions at each facility.

Communications

A contact number or means of radio communications and scheduling process will be established and maintained by a dock master or alternate at each facility.

Vessel Haul

Haul out is not necessary in cases where the vessel can be cleaned in the water.

If a vessel cannot be cleaned at a vessel cleaning station in a marina, haul out might be required. This situation would generally occur if the vessel requires significant decontamination below the water line. Vessel haul-outs will be coordinated between the lift operator, boatyard, and vessel cleaning staff at the direction of an O'Brien's Group representative. If possible, hauled vessels will be cleaned while suspended in cradles, travel lift straps or other suitable means over fabricated containment/catchments areas to ensure the safety of cleaning personnel. Vessel lifts will be limited to the travel lift and/or crane's rated capacity. The vessel lift operator will be qualified to operate the specific lift machinery and shall be made available by the marina facility.

After cleaning, the vessel will be returned to the water or placed on a trailer provided by the vessel owner.

Decontamination Procedures

Marina-Based Cleaning Stations

Lightly contaminated vessels (for example, vessels oiled only along the waterline) may be cleaned by ballasting the vessel to bring one side out of the water, exposing the oil above the water line, for wiping with approved cleaning agents and methods. These guidelines are generally not intended for use for cleaning below the waterline.

- Boats using a marina-based cleaning station will transit the marina to the station and enter the designated cleaning area. This area will be manned by a small skiff to open and close the station's booming system. This booming system will consist of appropriately-sized and configured hard boom and an inner sorbent boom to contain any floating oil.
- The vessel inside the cleaning station will be ballasted, typically with three or four personnel, to raise one side out of the water.
- Another crew will use sorbent pads soaked with approved treatment agent(s) to manually wipe the oil from the vessel's hull. All efforts will be made to minimize the introduction of the treatment agent into the water.
- After the oil has been removed, hulls will be wiped again with dry sorbent pads to remove any remaining residue. Boats will not be released from the boomed area until sheen is collected.
- This process will be repeated to clean all sides of the vessel.
- If this method is not effective, the use of CytoSol, in the manner approved by the Regional Response Team (RRT), may be considered.
- Waste minimization practices are required.
- Representative claims adjuster(s) will be present to close each claim.
- Hours of operation will be between 7:00 am and 4:30 pm, unless otherwise specified by the dock master or the O'Brien's Group representative.

Monitoring of cleanup operations will be coordinated through the Department of Fish and Game and the appropriate Regional Water Quality Control Board to ensure that operations are in compliance.

Boat-Yard Cleaning Stations (Vessel Haul-out)

If vessels cannot be safely cleaned at a marina-based cleaning station, washing of contaminated portions of the hull, boot tops and freeboard will be carried out with pressure washers after vessel haul-out.

Waste water from pressure washing and all contaminated debris and sludge created during the cleaning process will be removed and properly disposed.

The following decontamination procedures will be employed for vessels in haul-out areas:

- Operations will be conducted in lined containment or in a boomed area.
- All rinsate and contaminants will be captured using containment basins, absorbent materials, or into sanitary sewers as allowed by the boatyard's permit.
- Cleaning methodologies (Hotsy, handwipe, etc.) will be tested on a small area of each boat.
- Hot water wash is preferred – approved treatment agents may be used pending the results of test cleaning.
- Waste minimization practices are required.
- Representative claims adjuster(s) will be present to close each claim.
- Hours of operation will be between 7:00 am and 4:30 pm, unless otherwise specified by the dock master or the O'Brien's Group representative.

Vessel containment/catch basins or diversionary structures will be constructed of suitable materials to prevent leaking of wash fluids and contaminants into the environment. They will be suitably sized to fit inside the footprint of the travel lift or crane utilized.

All day-to-day scheduling, directing of cleaning operations, and claims information gathering will be the responsibility of and carried out under the supervision of The O'Brien's Group. Work force levels provided by the environmental contractor shall be coordinated between The O'Brien's Group and the environmental contractor.

Decontamination Stations

Vessels will be instructed to proceed to a dedicated decontamination station as appropriate. Contact information for scheduling cleanup at these stations will be provided through the D&A Team once the assessment has been completed. Cleaning or decontamination will be accomplished using the procedures established for the station.

Individual Vessel Cleaning Arrangements

Large, commercial, historical, public, or other vessels may require special accommodations or on-site cleaning at the vessel's moorage. These individual cleaning arrangements will be determined on a case-by-case basis by the D&A Team, which will include the appropriate federal, state and/or local authorities.

Care, Custody and Control

Responsibility for the transportation of the vessel to and from the cleaning facility(s), and throughout the cleaning evolution, remains with the vessel owner or representative. This owner or representative must be present at all times during decontamination and/or cleaning.

Situation Status

The Claims Unit will be tasked to provide a daily update of Recreational Boat Claim Activity. This daily update will include the following information:

1. Number of claims received.
2. Physical location of each claim (address or marina name).
3. Date of assessment.
4. Settlements offered.
5. Boats requiring cleaning.
6. Owner contact information.
7. Claims settled.

The claims data will be consolidated into a report outlining the number of claims received, number of assessments, and number of claims closed.

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Decontamination Station Locations

Location	Contact Person	Address
Pier 96	Walt Dorn (562) 244-2205	Jennings Ave San Francisco, CA
NRC Alameda Facility	Tim Babcock (510) 774-0088	1605 Ferry Point Alameda, CA 94501

NRC Environmental Services

1605 Ferry Point
Alameda, CA 94501
(510) 749-1390

YAHOO!



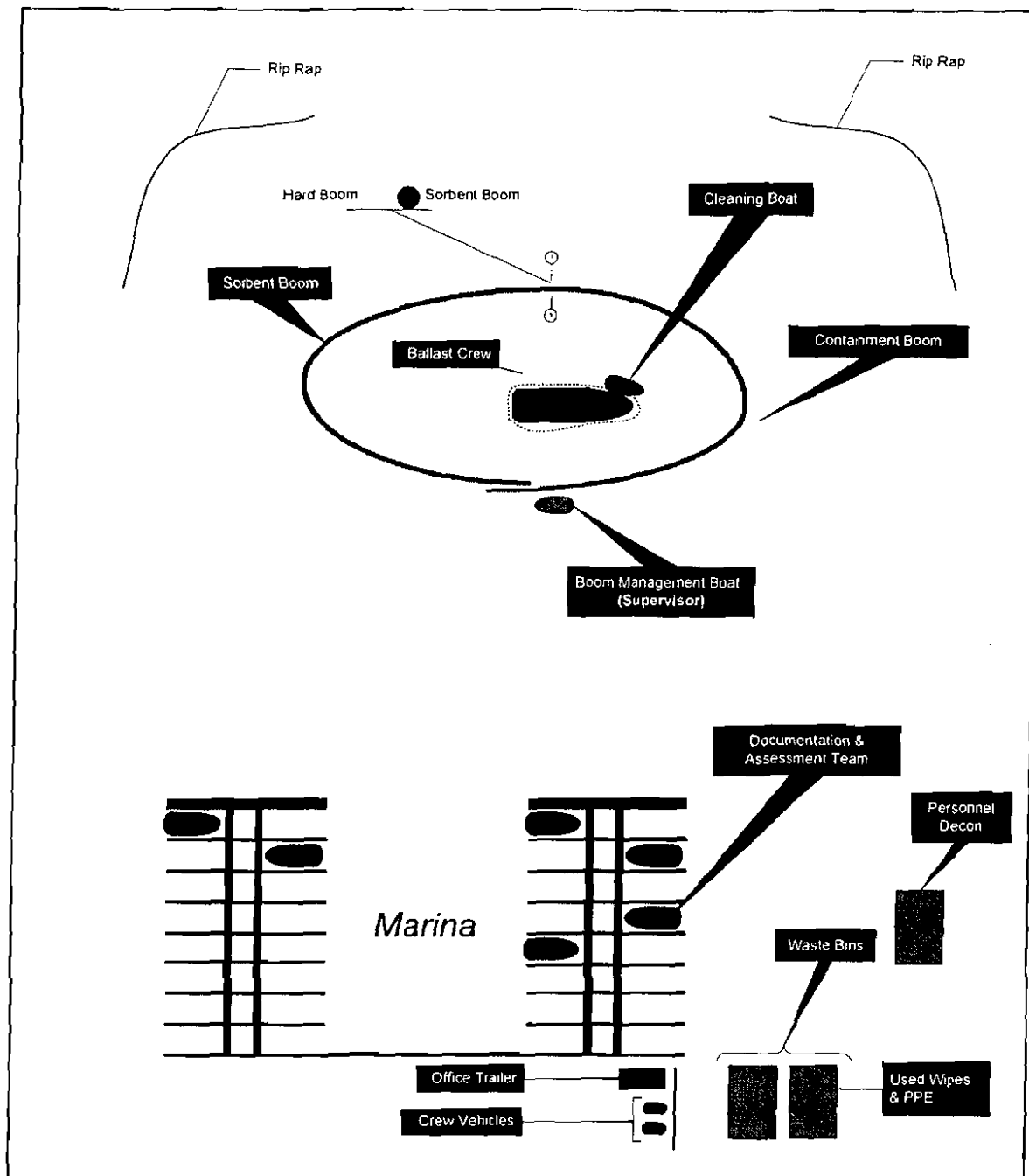
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Pier 96

Operated by Patriot Environmental Services





Example of Proposed Marina-Based Vessel Cleaning Station