Pathway to Protection

The Alaska Response Company, LLC
Alternative Compliance
Non-tank Vessel Oil Spill Response Plan

Based on USCG
Alternative Planning Criteria Guidance

Prepared by:
Alaska Response Company, LLC

September 2, 2016

REVISION 1

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List of Figures (Chartlets)

RECORD of CHANGES

Date	Pages Effected	Description
9/2/2016	1	Added text "Revision 1" and changed date to September 2, 2016
9/2/2016	2-35	Changed footer to "September 2, 2016 | Revision 1"
9/2/2016	6	Changed ASCI VTRAC to Aleutians Spill Control, Inc. ("ASCI")
9/2/2016	8	Expanded OSRO to "ASCI's Oil Spill Response Organization (the OSRO)."
9/2/2016	12-13	Revised language and tables referencing "additional equipment to be purchased" in the future to reflect that the equipment was purchased and positioned on Adak prior to Revision 1 and to reflect new response equipment totals after the addition.
9/2/2016	17-19	Revised language and tables to update that additional equipment added has eliminated any nearshore WCD1 protection gaps in skimming capacity and protective boom.
9/2/2016	19	Replace words "AK" with "Alaska" and "response" with "performance."
9/2/2016	21	Replace phrase "Vessel Tracking and Response Compliance" with "Vessel Tracking, Response Analysis, and Compliance."
9/2/2016	25	Added "and the ASCI Operations Center" and corrected Operations Center email address from "ops@asci-vtrac.com" to "ops@osro.global."
9/2/2016	26	Corrected Operations Center email address from "ops@asci-vtrac.com" to "ops@osro.global," changed nomenclature of "Notice of Arrival (NOA)" to "Notice of Transit (NOT)," and changed "Watch Center" to "Operations Center."
9/2/2016	30	Changed "Watch Center" to "Operations Center."
9/2/2016	27	Corrected "Amakta Pass" to "Amukta Pass."
9/2/2016	23	Delete item "1) Crossing closer than 50, 24, and 12 NM to shore," and replace with "1) Crossing into (or out of) an Area To Be Avoided and closer than 24 and 12 NM to shore (Aleutian Islands Subarea)." Add item "2) Crossing closer than 50, 24, and 12 NM to shore (Bristol Bay or Kodiak subareas)." Renumber items 2)-4) to items 3)-5).
9/2/2016	26	Delete item "2. Unimak, Amchitka, Amutka, and Buldir passes are the only authorized routes inside 50NM." Replace with item "2. Use only Unimak, Amchitka, Amutka, or Buldir passes as created by the ATBA.Unimak, Amchitka, Amutka, and Buldir passes are the only authorized routes inside 50NM."
9/2/2016	26	Insert text in item "4. Approach no closer than 50 miles of nearest land while transiting…" to read "4. Approach no closer than 50 nautical miles of nearest land as demarcated by the Aleutian Islands ATBA while transiting…"
9/2/2016	27	Insert text in item "1. Designated Routing Offshore and through ARC-approved passages: Enrolled vessels transiting under the ARC Plan will maintain a distance of at least 50 nautical miles (nm) from land (offshore) except for the two exceptions noted as follows:" to read "1. Designated Routing Offshore and through ARC-approved passages: Enrolled vessels transiting under the ARC Plan will maintain a distance of at least 50 nautical miles (nm) from land

		(offshore), and/or as demarcated by the Aleutian Islands ATBA, except for the two exceptions noted as follows…"
9/2/2016	27-29	Replace Figures 1-4 Chartlets of Approved Passes with new nautical Chartlets Figures 1-4 of Approved Passes as demarcated by the ATBAs. Replace Figure 5 Great Circle Route Area Showing Passes and Subareas with Figure 5 Great Circle Route Area Showing ATBAs, Passes, and Subareas.
9/2/2016	30	Insert text in item B subitem "i. Whenever an enrolled vessel unexpectedly comes within 50/24/12 nm of shore" to read "i. Whenever an enrolled vessel unexpectedly comes within 50 nm and/or as demarcated by the Aleutian Islands ATBA; and 24 and 12 nm of shore."
9/2/2016	30	Insert text in item "c. A vessel within the 50-mile limit is closely monitored by the ARC watchstander until the deviation is corrected…" to read "c. A vessel within the 50-mile limit, and/or as demarcated by the Aleutian Islands ATBA, is closely monitored by the ARC watchstander until the deviation is corrected."
9/2/2016	30	Insert text in item 4 subitem "b. Crosses closer than 50/24/12 nm to shore" to read "b. Crosses closer than 50 nm and/or as demarcated by the Aleutian Islands ATBA and 24 and 12 nm to shore."
9/2/2016	31	Replace item 8 text of "within 25 NM of land" to read "within 24 NM of land."

EXECUTIVE SUMMARY

THE ALASKA RESPONSE COMPANY Alternative Plan Criteria

By approval of this Alternative Plan Criteria, Alaska Response Company, LLC (ARC) is granted permission to use an Alternative Plan Criteria for the Aleutians, Bristol Bay, and Kodiak subareas of the Western Alaska Area. The approval is based on the Alternative Planning Criteria described in this plan, and as provided for in federal regulation[1] for non-tank vessels transiting through the Aleutians. Under existing regulation, vessels sailing through Alaska need an appropriate compliance mechanism that protects Alaska natural resources throughout the Aleutians and offers ship operators a reliable oil spill response plan. ARC, with its partners The Aleut Corporation, Aleutians Spill Control, Inc. (ASCI) and DESMI, offers that solution with the following attributes:

- A robust OSRO aligned with local capability and infrastructure
- A long-term plan to build additional response capability
- Agreements to cascade in additional resources, and access to the infrastructure necessary to mount an effective and timely response
- A vessel tracking and monitoring system (AIS-based) with automated notification capability to a vessel's designated incident response team
- 24/7 Vessel monitoring watch team
- An experienced plan administrator to ensure continued compliance and facilitate coordination among the covered vessel operators and the collaborative parties to the Plan
- A comprehensive plan developed in collaboration with vessel operators, their designated responders, and local stakeholders that enhances Alaska's oil spill prevention and response capability with a focus on the waters surrounding the Aleutian Islands.

[1] 33 CFR 155.5067 (2014)

INTRODUCTION

The National Academy of Sciences, in their 2014 Arctic spill report concludes:

> "Effective oil spill response requires improved communication bandwidth and networks; transportation systems; environmental and traffic monitoring systems; energy and fuel systems; personnel, berthing, housing, waste and medical support facilities; as well as civil infrastructure development to provide improved port and air access to remote locations using extended supply chains and an increased capacity to handle equipment, supplies, support and personnel. Strategic development of multi-use facilities (e.g. schools, community buildings, gymnasiums) would enable them to be used as response control centers. Human and organizational infrastructure improvements are also required to improve international and tribal partnerships so as to leverage scientific and traditional knowledge and best practices." [2]

The Alaska Response Company's Alternative Plan Criteria (ARC-APC), in partnership with The Aleut Corporation, directly addresses these operational and logistical considerations. Leveraging shippers' responsibilities for oil spill response planning with The Aleut Corporation's ongoing infrastructure development and community and tribal inclusion provides the optimal response system for the Aleutians.

BACKGROUND

New federal oil spill response regulations have a significant impact on vessel traffic through the Aleutian Islands. The Oil Pollution Act of 1990 (OPA 90) now applies to large (over 400 gross tons) non-tank vessels (NTV) in addition to tank vessels. Operators of NTVs transiting to or from U.S. ports on the North Pacific Great Circle Route, placing them in U.S. waters through the Aleutian Islands, must be in compliance through this area. These changes require significant numbers of regulated vessels to secure spill cleanup contracts and identify acceptable compliance measures.

The Aleutians are remote, weather can be extreme, and there is limited infrastructure. Many response planning standards called out in OPA 90 are not practical in western Alaska stretching across a thousand miles of the remote Pacific Ocean islands. Because of these and other factors, Alternative Plan Criteria are needed.

The Aleutians also include native stakeholders of critical significance. The USCG is mandated to consult and coordinate with Indian Tribal Governments.[3] The Aleut Corporation, the local Native Regional Corporation of the Aleutians, is presenting this collaborative offer of a shared path to protection in their home waters and shorelines of the Aleutians.

[2] National Academy of Sciences, Responding to Oil Spills in the U.S. Arctic Marine Environment, 2014
[3] Per US Executive Order 13175, 2005

FACTORS REQUIRING ALTERNATIVE PLANNING CRITERIA

The remote Aleutian Islands sit on the North Pacific Great Circle Route between North America and Eastern Asia. Though very heavily trafficked, there is limited oil spill prevention and response capability in this sparsely inhabited and largely un-developed area. Non-tank vessels over 400 gross tons traveling to or from a U.S. port must comply with OPA 90 while in U.S. waters. Full compliance would require significant prepositioned oil spill response personnel and resources (approximately every 200 miles) ready to respond in prescripted timeframes when a spill occurs. It is not practical to pre-position extensive response capacity along the remote Aleutian chain to meet that standard. Alaska Response Corporation Alternative Compliance is necessary.

While operating in this area, vessel operators must maintain contracted oil spill cleanup resources and a Geographic Specific Appendix in their Vessel Response Plan (VRP) for this area. While certainly Alaska needs protection for her shores and waters, providing full compliance to regulations designed for more developed regions is problematic because of the vast distances, limited infrastructure, harsh climate, remoteness, winter weather, and other challenges. Vessel operators must comply, but the cost of full compliance to the letter-of-the-law under OPA 90 would be prohibitive. "Alternative Planning Criteria" were allowed in regulation specifically for remote situations such as those posed by the Aleutian Island chain.

ALTERNATIVE COMPLIANCE

Alaska Response Company will provide requisite environmental protection in a unique plan expressly suited to the Aleutians. This Alaska Response Corporation Alternative Plan Criteria (ARC-APC), based on utilization of the pre-positioned infrastructure and resources of the Aleut Corporation, addresses protection of the shorelines and natural resources, vital in supporting the local population for subsistence, as well as the local economic engine of fisheries.

Unless approval of an appropriate Alternative Criteria is achieved, the lack of prevention and response capability in the area effectively forces vessel operators to travel outside of the preferred Great Circle Route. This route deviation to stay outside of compliance zones increases operator costs in time and fuel. Appropriate compliance measures, as described and offered in this plan, allow vessels to stay on route, while also contributing to response capacity building through collected fees.

The ARC-APC offers compliance and oil spill response services using the collaborative resources of the local Regional Native Corporation (The Aleut Corporation) and the associated regional response provider ASCI's Oil Spill Response Organization (the OSRO). Response services are available to client vessels as well as vessels engaged in innocent passage.

In addition to the services of the OSRO, this plan also includes agreements to cascade in additional response capability. Since stipulated response times per OPA 90 regulation cannot be met in all of Western AK COTP Zone, this Alternative Planning Criteria identifies gaps and offers alternative procedures, methods and/or equipment standards for planning, response and pollution mitigation strategies. The Plan also addresses environmental and economic impacts as required.

The OSRO is ideally situated and suited to provide infrastructure, services, and cleanup equipment for mounting an oil spill response in this area. The Aleut Corporation furnishes necessary local ingredients to

conduct response. Their assets start with meeting the basic needs of responding personnel: transport, housing, feeding, and emergency treatment facilities. In addition, the OSRO can provide response headquartering, staging, fueling, maintenance and related response functions from their already established bases at Adak and Cold Bay.

ECONOMIC IMPACT and COSTS FOR COMPLIANCE

Availability of OSRO coverage in the Aleutians under this ARC-APC offers a cost-effective option for vessels to stay on the Pacific Great Circle Route rather than choosing routes further offshore. Offshore routing increases both cost in fuel and time, and environmental risk. The ARC-APC and Adak OSRO enhance and grow local spill response capability, providing employment opportunities for local residents while offering environmentally sensitive solutions to mitigate spill incidents.

According to early draft reports from the Aleutian Islands Risk Assessment,[4] fully meeting OPA 90 response capability in the Aleutians would require capital costs of up to $40 million to establish, and $40 million in annual operating costs. Other reports cite hundreds of millions of dollars for such a capability, which would result in exorbitant fees for full immediate compliance. Reports indicate that vessels in the lower 48 are able to obtain OSRO coverage for the entire contiguous U.S. for just a fraction of this cost. NTVs, already operating on tight margins, could easily opt out of expensive Aleutian's compliance criteria and sail offshore, halting capacity building. Fuel savings for regulated vessels staying on route can contribute to building response caches if market forces are respected and encouraged.

Additionally, innocent passage vessel traffic (those vessels not going to or coming from a U.S. port) off Alaska's shores will continue to increase over time as Canada considers exporting tar sands crude and new routes encourage more arctic sailings of world trade vessels. These "innocents"- without OPA 90 compliance requirements or contribution to response capacity - continue to pose threats to Alaska shorelines. Aleut stakeholders cannot allow this, and wish to solve this problem with practical, feasible response measures that protect their shoreline and marine resources from ALL vessel traffic.

Much of the revenue from compliance fees under this plan will be used to build new response capability in Alaska, benefiting the entire spectrum of transiting vessels on these Great Circle Routes.

This ARC-APC is a response and prevention plan, helping to lower the risk of spills and providing adequate response measures should a spill occur. With Aleut Corporation resources and infrastructure, the ARC-APC offers alternative procedures, methods and equipment criteria to the standard OPA 90 requirements but nevertheless enhances the existing response capability. In addition, as the Aleut Corporation continues to expand infrastructure to support the needs of the shipping community - including Ports of Refuge and other vessel support facilities – they also, through the OSRO, continue to expand spill cleanup resources as discussed later in this document. The regulated community of vessel owners and operators contributes to this expanded capacity through their enrollment into this Alternative Plan Criteria.

[4] Aleutian Island Risk Assessment, http://www.aleutiansriskassessment.com/documents/110826AIRA

QI, SMT and INNOCENT PASSAGE RESPONSE

'Lessons Learned' from the Selendang Ayu Incident identified the need for a capable, established OSRO in the Aleutians. A members-only co-op must look out for the needs and well-being of their membership first. A co-op is not necessarily in a position to expose their members to a prolonged, major response, especially for non-members such as the Selendang Ayu incident demonstrated. During that response, the first responding co-op OSRO quickly sought to reduce their role and exposure from hiring vessels as soon as the Responsible Party's Spill Management Team (SMT) arrived on scene. This presented a challenging insurance problem for engaging local vessels to respond, as described in International Oil Spill Conference Proceedings[5].

An SMT is not an OSRO, and cannot quickly assemble the OSRO components needed in a response - despite the traditional blending of these roles in Alaska. The blurring of lines between spill management and oil spill cleanup contractors has caused confusion and increased rates for insurance coverage for vessels operating in and through Alaska.

In the case of the Selendang Ayu, that vessel already had a U.S. Qualified Individual (QI) and Spill Management Team (SMT). The responding QI and SMT faced the daunting task of essentially forming an OSRO from scratch for this Alaska response. Securing insurance cover for local vessels to assist with spill response was not an instant proposition. This is one of the functions that an existing OSRO serves. During a response, they are a known quantity to underwriters who can more quickly add coverage for additional vessels, a key response need. The lack of a qualifying OSRO to continue the response proved problematic.

This ARC-APC encourages growth of spill response capability available to respond to both regulated (OPA 90) and unregulated shippers. Alaska, and especially the Aleutians, currently have limited response capability of this type.

[5] International Oil Spill Conference Proceedings, 2006

ARC-APC to Meet WCD1 Levels of Equipment within the Western Alaska COTP Zone

In 2015 a significant amount of equipment was added to the cache of available resources on Adak Island (see Table 2).

Based on historic Sector Anchorage requirements to equal WCD1 nearshore capabilities within the Western Alaska COTP Zone, and subject to Sector Anchorage's endorsement of this ARC-APC, additional boom and skimming equipment will be purchased for delivery to Adak Island to supplement (1) previously owned and (2) recently purchased equipment in support of this ARC-APC. This additional equipment (shown in Table 1) will be within the Coast Guard's Western Alaska Area no later than 150 days from the date of plan approval.

Alaska Response Company, LLC also is using ~50,000 bbl of fixed on-land storage on Adak Island, in two dedicated storage tanks, to substitute for ~ 20,000 bbl temporary floating storage that exceeds WCD1 nearshore requirements (see Table 11). Fixed on-land storage capacity is extremely limited in the Aleutians. Designating fixed storage for the area increases response capacity for all responders and shippers, increasing region-wide readiness.

Recovery Equipment, Gap Analysis, Planning Volumes

Alternative Planning Criteria guidance calls for analysis of planning volumes and discussion of shortfalls or gaps. This section provides that discussion, the ARC-APC's intent, through Aleut Enterprise OSRO, to increase existing OSRO capabilities in the Aleutian Islands.

Resident Equipment Capabilities

OSRO Classification Program Criteria, and Adak OSRO gaps relative to those classifications for Effective Daily Recovery Capacity (EDRC), Boom, and Temporary Storage Capacity (TSC), and response time are examined here:

The OSRO has historically included the following capability with its equipment inventory:

- Effective Daily Recovery Capacity (EDRC): 1810 bbl
- Protective Boom: 2400 feet
- Temporary Storage Capacity (TSC) on water: 5363 bbl.

This recovery and protection capacity is based on the following primary equipment:

- Boom (1400 feet)
    - 1000 ft Class II 18" (Adak)
    - 1000 ft Class II 18" (Cold Bay)
    - 400 ft. MKE 24" Containment Boom (Adak)

- Skimmers (3)

    - Manta Ray
    - SkimPak 18300
    - SkimPak 2300
- Floating Storage Pillow/Towable Bladders (5363 bbl)
    - Dunlop Dracone, Cadillac, FastTank, Fabritank

The following additional equipment has been entered into USCG RRI, and positioned on Adak in direct support of this ARC-APC:

2015:

- Boom (7850 feet)
    - 1550' DESMI Troil Boom 750
    - 5000'DESMI CSUI-18, 18" Inflatable Boom
    - 1300' Offshore RoBoom, 42" Containment Boom
- Skimmers (1)
    - GT 185 Helix Skimmer

Aleut Enterprise, LLC will also make available and maintain an on-land fixed storage capability.

- Fixed Storage Capacity: designated for spill response
    - 50,000 bbl at Adak (2 dedicated tanks)
    - 2400 bbl at Cold Bay

Table 1 Response Equipment Totals

BOOM	SKIMMER	STORAGE
Current Capability	**Current Capability**	**Current Capability**
Harbor boom: **2400 ft.** Troil: **1550 ft.** 18" Inflatable: **5000 ft.** RoBoom Ocean Boom 42": **1300 ft.** 18" Contractor Special Boom: **20,000 ft.** **Exceeds WCD1** **Current Total:** **30,250 ft**	Small Drum and Wier: **1810 bbl/day** GT 185: **1584 bbl/day** DESMI Octopus: **9106 bbl/day** **Exceeds WCD1** **Current Total:** **12,500 EDRC**	On Water temporary storage: **5363 bbl** On land fixed storage: **~50,000 bbl** **(2 dedicated tanks)** **Exceeds WCD1** **Current Total:** **55,300 bbl**

The Aleut Enterprise OSRO maintains, tests and operates this new equipment in accordance with NPREP Guidance, as they have with existing equipment in the past.

The following table lists Adak Island vessels available to the Adak OSRO.

Table 2 Response Vessels

Response Vessels Adak OSRO		
Response Vessels at Adak: NOTE: This is a representative sample of boats available. This list changes but at least four are available at any given time.	25' Boston Whaler w/twin 150 HP motors 20' Alumaweld 270 HP 16' C-Dory 40HP 15' Aluminum Skiff with 35 HP 18' Boston Whaler skiff under contract 20' Boston Whaler skiff under contract	
Response Vessel of Opportunity		
Immediate Response in Western Alaska	Landing Craft "Arctic Seal" 130.83 ft. LOA (Agreement with Lynden Alaska Marine Services) – Homer, Alaska	

Agreements are in place to utilize the extensive vessel-of-opportunity fleet of Alaska Marine. Alaska Marine maintains oil spill landing crafts stationed in Homer year round which operate in Western Alaska COTP Zone. Of the four landing crafts owned by Alaska Marine, two remain in the Western AK Zone at any one time. In addition, Alaska Marine maintains an extensive fleet of vessels that operate within Western AK stationed in Dutch Harbor, Bethel, Naknek, Nome and Kotzebue. Alaska Marine has a 100 acre site and facilities in Dutch Harbor to load their landing craft.

Cascade Equipment Capabilities

To augment resident spill response equipment, this ARC-APC makes use of non-spill equipment, existing infrastructure, and other resources on Adak Island and cascades off-island resources offsetting identified gap-analysis shortfalls. Additionally, the plan mitigates shortfalls with non-traditional prevention measures including vessel AIS tracking and monitoring. These additional measures serve to mitigate risk proportionate to the limited maximum available response resources in this remote area.

The below, and additional mitigating resources and capabilities, are further discussed in the Aleutian Islands Sub Area Plan.[6]

The below listed Aleut Enterprise resources and capabilities add to region-wide response readiness for the Aleutians. These are critical infrastructure resources of a type often utilized during spill responses:

- 465,000 bbl petroleum storage
- Bulk fuel sales
- 500,000 sq. ft. warehouse space
- Vessel wharfage and moorage capabilities
    - Pier 3 – 400 ft vessel with 25 ft draft
    - Pier 5 – 550 ft vessel with 27 ft. draft
    - Fuel Pier – 700 ft. tanker with 30 ft. draft
- Housing facilities
- Jet aircraft capable runways (2 @7600'+)
- Airport Services
- Vacuum truck, rolling stock and heavy earthmoving equipment

Cascade Plan and Area of Coverage under the ARC-APC

The Cascade Plan for the ARC-APC includes spill response equipment from the lower 48 states and elsewhere.

Specifically, agreements are in place through DESMI to begin equipment mobilization from the lower 48 states for cascading boom and skimming resources for Tier 2 and 3 CAPS. This mobilization effort will supplement local capacity. Due to the large airstrips used by Aleut Corporation at Cold Bay and Adak, large cargo aircraft shipments of response gear from anywhere in the lower 48 can arrive at these staging areas nearly as fast as air deliveries from within Alaska, AND faster than response gear placed on vessels from other parts of Alaska such as Prince William Sound/Valdez (SERVS) or Cook Inlet (CISPRI).

Though it is not practical to meet response planning standard time requirements within the remote reaches of Alaska, the AK Response Company, LLC Plan assures that appropriate levels of gear are available for a Worst Case Discharge response for transportation to wherever it may be needed. For an Aleutian Islands' response, additional equipment will be delivered directly into the base at Adak. But note the same cascade plan could assist response needs to any area within the Western AK COTP Zone.

[6] Aleutian Island Sub Area Plan under the USCG-ADEC Unified Plan (Alaska Federal/State Preparedness Plan for Response to Oil and Hazardous Substance Discharges/Releases

Transportation Logistics and Personnel

Air Transportation

There is a great air logistics synergy between Anchorage and Adak. As one of the great air crossroads of the world Anchorage has very good availability of aircraft and with Adak's great air access infrastructure, the two airports allow relatively easy transportation capability for both equipment and personnel. While there are many occasions when Unalaska (Dutch Harbor) is severely limited by weather and its challenging airstrip, Adak generally is not nearly as restricted in its flight access. In fact, major airlines have used Adak as an emergency landing site.

Anchorage has air charter operations of all sizes, with 24/7 availability. While no formal arrangements are in hand, the availability of these operations are sufficient to make access to quick air transportation an easy endeavor. A few examples:

Ace Air Cargo has 7 (as of Jan 2016, soon to increase to 8) Beech 1900s suitable for hauling passengers and freight to Adak. Three of the aircraft are dedicated to cargo and 4 are dual-use for either passengers or freight. These aircraft can haul up to 16 people, with more fuel stops, or fewer people and faster trips. Cargo capacity is up to 5000 pounds. The average flight is about 5 hours including fuel stops. **Contact for freight/charters is Steve Melcher 907 240-9508; for passengers, Vicki 907 440-1280.**

Security Aviation has 4 Cessna Conquests. They can haul 7 passengers with 1 fuel stop or 9 passengers with 2 fuel stops and limited amount of personal gear. **Contact for Security Aviation is 907-248-2677.**

Alaska Airlines will send a 737 out to Adak with 100 people anytime between 10:30 pm and 6 am when their aircraft are not flying normally scheduled runs. **Contact is Susie Hoadley in Seattle at 206-392-5256.**

Personnel and Training Availability

Access to trained response personnel is a key component to the success of this plan. There are many sources of trained responders in Alaska, not least of which is the current OSROs who welcome the opportunity to provide on-the-job training of their personnel with real oil in a real spill.

There are several commercial groups who routinely supply trained personnel in the event of a spill. In addition, ARC maintains an agreement with trained fishing vessel personnel to coordinate access to vessel of opportunity crew who regularly train with SERVS in Prince William Sound and the Kenai Peninsula. While many of these responders are Valdez-based fishers, they are also based in many other Alaska communities. The Vessel of Opportunity fishing vessel fleet consists of highly experienced personnel trained in on water operations. They are safety-conscious due to living and working on the water regularly. In addition to their on-water practical skills they regularly engage in drills, deploying spill equipment, and they maintain current HAZWOPR training credentials.

Equipment and Time Gap Analysis

The following tables show required equipment amounts of EDRC, Boom and mobile TSC as called out in OSRO Classification and as required for analysis in APC guidance. The first table for each equipment category below (Tables 3, 6, and 9) show the required amounts of gear for Worst Case Discharge. Non-tank vessel regulations only require WCD Tier 1 response, but the tables provide analysis for WCD2 and WCD3 as well. The second table (Tables 4, 7, and 10) for each equipment category, shows the current amount of the Adak OSRO capacity and gaps. Though gaps in pre-positioned equipment currently exist, nearshore WCD1 equipment gaps for boom and skimmers are closed with the additional resources on order for delivery no later than 150 days after plan approval, as shown in Tables 5 and 8.

Because of the enormous geographic extent of the Aleutians, time gaps for on-scene response times will likely always remain.

Effective Daily Recovery Capacity

1) Required EDRC Amount in Barrels per Day for OSRO Classification

	Vessel MMPD	Vessel WCD1	Vessel WCD2	Vessel WC3
River or Canal	1200	1875	3750	7500
Inland	1200	12500	25000	50000
Nearshore	1200	12500	25000	50000
Offshore	1200	12500	25000	50000

Table 3 Required EDRC; BBLs/day

2) The OSRO currently has 12500 EDRC. The Remaining Gaps (bbls/day) are shown below:

	Vessel MMPD	Vessel WCD1	Vessel WCD2	Vessel WC3
River or Canal	No gap	No gap	No gap	No gap
Inland	No gap	No gap	12500	37,500
Nearshore	No gap	No gap	12500	37,500
Offshore	No gap	No gap	12500	37,500

Table 4 EDRC Gap Analysis (bbls/day)

The ARC-APC with new skimming equipment closes the nearshore WCD1 skimming capacity gap, but could fail to meet the 24-hour response planning standard of OPA 90.

Boom

1) Protective Boom amounts in feet required for OSRO Classification:

	Vessel MMPD	Vessel WCD1	Vessel WCD2	Vessel WC3
River or Canal	4000	25000	25000	25000
Inland	6000	30000	30000	30000
Nearshore	8000	30000	30000	30000
Offshore	8000	15000	15000	15000

Table 5 Boom Requirements

2) The OSRO currently has 30240 total feet of boom. ASCI has no nearshore WCD1 Protection Boom Gaps (feet) per the below:

	Vessel MMPD	Vessel WCD1	Vessel WCD2	Vessel WC3
River or Canal	No gap	No gap	No gap	No gap
Inland	No gap	No gap	No gap	No gap
Nearshore	No gap	No gap	No gap	No gap
Offshore	No gap	No gap	No gap	No gap

Table 7 Boom Gap analysis with additional boom

The OSRO closes nearshore WCD1 protection boom gaps, but could fail to meet the 24 hour response time planning standard of OPA 90.

Temporary Storage Capacity

1) Required TSC amounts in bbl for OSRO Classification:

	Vessel MMPD	Vessel WCD1	Vessel WCD2	Vessel WC3
River or Canal	2400	3750	7500	15000
Inland	2400	25000	50000	100000
Nearshore	2400	25000	50000	100000
Offshore	2400	25000	50000	100000
Open Ocean	2400	25000	50000	100000

Table 6 Temporary Storage Requirements

2) The OSRO currently has 5363 bbl on water temporary storage capacity, and gaps are:

	Vessel MMPD	Vessel WCD1	Vessel WCD2	Vessel WC3
River or Canal	No gap	No gap	2137	9637
Inland	No gap	19637	44637	94637
Nearshore	No gap	19637	44637	94637
Offshore	No gap	19637	44637	94637
Open Ocean	No gap	19637	44637	94637

Table 7 Temporary Storage Current Gap analysis

3) The OSRO, with 50,000 bbl fixed storage substitution as proposed for on water temporary storage capacity, would close nearshore WCD1 gaps:

	Vessel MMPD	Vessel WCD1	Vessel WCD2	Vessel WC3
River or Canal	No gap	No gap	No gap	Gap remains
Inland	No gap	No gap	No gap	Gap remains
Nearshore	No gap	No gap	No gap	Gap remains
Offshore	No gap	No gap	No gap	Gap remains
Open Ocean	No gap	No gap	No gap	Gap remains

Table 8 Temporary storage gap analysis with fixed storage addition

AK Response Company Plan with the OSRO currently meets requirements for MMPD in all operating environments and WCD1 in River or Canal operating areas for Temporary Storage Capacity. The gap for nearshore WCD1 is closed with the substitution of 50,000+ bbls fixed storage in two dedicated tanks for temporary floating storage.

Closing the Gap

Alaska Response Company and the OSRO will immediately begin identifying equipment for closing the gaps identified above, upon approval of this Alternative Plan Criteria. Equipment caches will be expanded on an agreed upon schedule with the USCG, based on the number of vessels participating in the Plan, and input from the AK Regional Response Team recommendations. In addition to spill cleanup equipment, The Aleut Corporation will also continue to close infrastructure gaps that contribute to all aspects of response readiness.

Reasons and Supporting Information for Alternative Compliance

This ARC APC will deviate from OPA 90 response planning standards for the reasons discussed below.

USCG Guidelines for Alternative Planning Criteria call for the reason and supporting information for the alternative planning criteria request. The OSRO boom, skimmer and vessel inventory alone and response times do not meet the national criteria and present gaps in capability per federal requirements.[7] These gaps are closed with the proposals for TSC substitution and additional equipment to be delivered following plan approval to meet WCD1 levels of capacity.

Conditions in the remote Aleutians can often delay response. Though the USCG planning standard is not a performance standard, the reality of the Aleutian's remoteness, limited infrastructure and extreme weather presents challenges. Meeting these challenges requires alternative planning criteria focused on more than just cleanup equipment caches.

[7] 33 CFR § 155 (2012)

Supporting information specific to the many aspects of response infrastructure and capability is addressed in the Aleutians Sub Area Plan. The Aleut Corporation and Aleut Enterprise, LLC make up a significant amount of that readiness and infrastructure.

Build Out Plan for Oil Spill Response Equipment

The Aleut Corporation OSRO will continue to grow infrastructure and response capability over time to address gaps.

Response resources at the Adak Island location will expand as vessel signup fees for the Plan allow. The focus will be on augmenting total response capacity in the area, to strengthen existing capabilities and infrastructure, i.e. gaps in resources not covered by other providers. Caches will also be built out, and added at other sites, as agreed with USCG and the AK Regional Response Team. The bulk of spill plan revenues will go to growing response equipment infrastructure with capital expenditures.

Because Dutch Harbor/Unalaska already has capabilities, the available funding/equipment will initially be directed to Adak. As caches are complete, site(s) will receive maintenance funding proportionate to inventory in future years. Detailed plans will identify exact equipment purchases, based on funding flow and criticality of needed equipment. The build-out plan will be submitted following the first ARC-APC renewal period.

Prevention Plan and Routing

Prevention Measures

Alternative plan compliance is required[8] to supplement shortfalls of OPA-90 required response capability with Coast Guard-approved prevention measures and is outlined (and approved) in this ARC-APC. Prevention is preferable to response. A system notifying response managers of a pending problem possibly days in advance, preventing a catastrophe, becomes a vital resource serving to cover the "gap" between available response assets and the regulatory requirements.

Our Vessel Tracking, Response Analysis, and Compliance (VTRAC) tool's robust monitoring is a part of this prevention equation. Together with watchstander oversight, it serves to bridge the inadequacies of response equipment (fully compliant or otherwise) hampered by time, distance and other logistical issues in significant portions of the operating area.

Specifically, this APC mitigates response measure shortfalls with prevention measures designed to reduce the necessity (or likelihood) of response actions with measures that could altogether prevent an incident. VTRAC, a custom-built, AIS-based monitoring and reporting system enhances existing notification systems within a vessel's response infrastructure. Vessels enrolled in the ARC-APC designate organizational and vessel response contact points, to whom potential impending issues are immediately transmitted - issues that could foretell a larger problem. Two methods of contact are employed.

(1) **Automated messages**, signaling POTENTIAL problems, are sent to these contacts when the system identifies an anomaly. The more serious an event, the wider the distribution of the message. While some of these notifications could be required notifications for hazardous conditions (per 33 CFR 160.204), it is not the intent of this system to supplant or duplicate that process. Rather it is designed to enhance it with notifications of POTENTIAL problems - triggered by the parameters identified in this plan.

(2) **Watchstander monitoring.** A 24/7 team of watchstanders, whose primary duty is to monitor the vessels enrolled in this APC, are watching the VTRAC system by way of desktop computer monitoring, ensuring the notifications and alerts received from the system are immediately acted upon. To mitigate the potential of a watchstander missing a notification, the system is designed to notify (via telephone/text) the watch supervisor and ARC management that a notification has not been acknowledged.

VTRAC is unique by way of these two separate contact methods, allowing redundancy AND rapid action to be taken. Further, the watch team monitoring these alerts provides for alert, energetic watchstanders to initiate timely action. While all vessel monitoring systems use a virtual, web-based notification protocol, VTRAC's strength is its (arguably improved) alerts and notifications that force watchstander action.

The system's process is outlined below and detailed in Appendix 1 – "ARC Procedures Manual for Vessels and Watchstanders" (Manual), all designed to mitigate these response shortfalls.

[8] Per USCG MSIB 03-14

Overview

The ARC-APC procedures complement existing USCG reporting requirements by designating required routing through the Alaska Aleutian Islands portion of the U.S. EEZ. The procedures utilize a custom-set of AIS-based monitoring and reporting protocols enhancing the existing notification system within a vessel's response infrastructure. The procedures as outlined in the Manual are in addition to ALL current notification requirements under federal regulations.[9]

The Manual included with this plan as Appendix 1 is used as a standalone watchstander and vessel document. The Manual must be available onboard all ARC-enrolled vessels, at the ARC Watchstander Stations, and at the U.S. Coast Guard (USCG) Sector Anchorage Command Center. ARC watchstanders and enrolled vessels will adhere to Manual procedures to maintain compliance under ARC-APC requirements.

Upon enrollment, vessels covered by this plan designate their onshore organizational response contact points to whom automated messages are sent as necessary. The vessel is also copied on these notifications in the event they may be unaware of a deviation. As noted above, these notifications are in addition to those required notifications for hazardous conditions,[10] but it is not the intent of this system to supplant or duplicate that process. Rather it is designed to enhance it with automatic notifications of potential problems - triggered by deviations from identified parameters and closely monitored by ARC 24/7 watchstanders.

Vessel Tracking, Response Analysis and Compliance (VTRAC Tool)

The AIS-based system monitoring and tracking VTRAC tool is a GIS-based application in which AIS-generated data is combined with geo-referenced ARC-APC-specific information and rules to monitor, in near-real time, the speed and location of enrolled vessels as they transit through the ARC-ACP coverage area.

The VTRAC tool provides:

- Near real-time (generally 3-10 minutes, with 1 hour maximum refresh rate) vessel tracking capabilities. Latency data (as of January 2016):
    - Average: 21 minutes
    - Minimum: 0
    - Maximum: 166 minutes (a long tail in the distribution)
    - Standard Deviation: 19 minutes
- Automatic monitoring and tracking on internet-based platform (speed, course, location)
- Notification system (via auto-generated text and email messaging) if a vessel falls outside the set of agreed routing measures

[9] Per 33 CFR § 160.215 (2012) (Notices of Hazardous Conditions)
[10] *Ibid*

- Display of and geo-located vessel routes and distance offset requirements (from land) for enrolled vessels
- Real-time location of vessels of opportunity
- Immediate access to vessel plans and data
- Automatic identification and notification when an enrolled vessel triggers an 'event,' described as one of the following when within the plan coverage area:
    1) Crossing into (or out of) an Area To Be Avoided and closer than 24 and 12 NM to shore (Aleutian Islands Subarea)
    2) Crossing closer than 50, 24, and 12 NM to shore (Bristol Bay or Kodiak subareas)
    3) Crossing into (or out of) an approved passage area
    4) Crossing across regional Sub Area boundaries inside the EEZ
    5) Speed reduction to under 5 knots

Vessel Routing

On June 12, 2015, the IMO Maritime Safety Committee adopted five 'Areas to Be Avoided' (ATBA) in the Aleutian Islands, effective January 1, 2016.

As described in the IMOs Routing Measures, the five ATBAs apply to vessels making trans-oceanic voyages through the Bering Sea and North Pacific Ocean, and extend 50 nautical miles from the shoreline of the islands.

The 50 nautical mile buffer zone is designed to allow for the repair of, or time to launch an emergency response effort to, any marine incident, before a vessel runs aground and damages the fragile ecosystem.

The routing measures of the ARC-APC are designed to meet these ATBAs.

ARC Watchstanders

Watchstanders on a 24/7 schedule provide an uninterrupted conduit actively monitoring and verifying an enrolled vessel's compliance in the Aleutians area. ARC Watchstanders are accessible to enrolled vessels, USCG, vessel owners, and/or QIs through a single telephone number, texting, or email. Through watchstander integration with the VTRAC tracking tool described above, the ARC-APC plan establishes 24/7 monitoring capability designed to mitigate response shortcomings. ARC watchstanders will intervene when necessary to ensure proper actions are being taken. ARC watchstanders will coordinate, as outlined in the Manual, with USCG Sector Anchorage Command Center to manage deviations and to communicate with participating vessels, QIs, and company shore personnel.

Contact number. Watchstanders are notified and can make calls through a SINGLE (see Manual) VTRAC phone number. By logging into the system, the watchstander has access to a GIS-enabled phone number - the same number for every watchstander. An incoming call to this number will reach whichever watchstander is on duty or is logged into the system. While Coast

Guard would only need to know that single number, they could also contact the VTRAC Supervisor 24/7 if necessary, or an individual watchstander's cell phone.

Location. Initially, a single office from which all watchstanding duties are accomplished, is set up in Anchorage, AK. However, the versatility of the VTRAC system, with its distributed network without loss of any functionality or capability, allows for distributed watchstanding. At such time that Coast Guard officials are comfortable with these distributed capabilities, a plan to distribute watchstanding functions (thereby enhancing the system's effectiveness) could be pursued with Coast Guard concurrence.

Watchstander Alertness. Distractions and boredom are the curse of any watchstander or monitor, no matter where he or she is located. Further, if that watchstander is alone, those distractions and boredom become all the more critical to avoid. VTRAC mitigates this potential by several means. These measures mitigate not just unauthorized work or inattention, but also the possibility of someone falling asleep.

- Log entry monitoring – Computer idleness is monitored with prompts to keep a watchstander engaged should more than 10 minutes elapse without computer interaction
- Failure to respond to VTRAC-generated email – If a watchstander fails to respond to a VTRAC alert or notification email, an auto-call and text to the watch supervisor is generated if 15 minutes elapses

Continuity of operations. The most important element in any continuity of operation is the ability to relocate if necessary. With a single office, in Anchorage, there will be a second office which can be staffed and activated in the event the first is incapacitated. When/if a distributed watchstanding network is put in place, the continuity of operations problem will be greatly alleviated as there will already be alternate locations functioning, based on the location of the watchstanders. With multiple site locations, there is excellent mitigation capability in the event of a loss of power at a watch station (or loss of connectivity). If the watchstander realizes power or connectivity is lost, a simple call to another watchstander or supervisor will allow another watchstander to come online until the problem is resolved. Even if the watchstander fails to realize power or connectivity is lost (nearly impossible with the built in checks and alerts), an auto-call is generated to the supervisor alerting them of a problem.

Appendix 1 - Procedures Manual for Vessels and Watchstanders

ARC-ACP is based on Alternative Planning Criteria guidance and institutes routing, monitoring and notification procedures as required by **MSIB 03-14.**[11] Procedures for communications among watchstanders, participating vessels, and the U.S. Coast Guard (USCG) per MSIB 03-14 are contained herein. Full-time ARC watchstanders actively monitor enrolled vessels 24/7 to verify compliance with the ARC-APC and will intervene when necessary through communication with participating vessels, their onshore support teams, and the USCG.

ARC provides enrolled vessels with a single point of contact (telephone or text) 907-222-7500 for watch standers and ARC administrative offices. Enrolled vessels will also receive instructions for when and under what circumstances the vessel should contact the ARC watchstander. ARC and the ASCI Operations Center can always be contacted through email ops@osro.global.

Upon enrollment, ARC covered vessels designate their onboard contact information as well as their onshore organizational emergency response contact points, to whom automated messages will be sent. These contacts are preloaded into an Automated Identification System (AIS) tool known as VTRAC (Vessel Tracking, Response Analysis and Compliance). ARC watchstanders and these pre-loaded contacts receive automated messages when a vessel slows down below 5 knots or deviates from ARC-established offshore routes or approved passages.

The ARC watchstander, through VTRAC, is alerted when an enrolled vessel enters the Aleutians area. The watchstander actively monitors each vessel to ensure compliance with routing parameters and ARC Plan requirements.

The ARC Prevention (Monitoring) Plan supports a vessel's Geographic Specific Appendix (GSA), within the United States Exclusive Economic Zone (EEZ) bounded by area north of 47N, east of 164E and west of 150W. ARC approved passages are Unimak, Amchitka, Amukta, and Buildir as shown in the included chartlets (Figures 1-4). The primary ARC response area for enrolled vessels focuses on the North Pacific Great Circle route, within the Aleutian subarea and appropriate portions of the Western Alaska, Bristol Bay and Kodiak subareas for vessels sailing on the North Pacific Great Circle route.

Compliance with these procedures is not required for enrolled vessels in innocent passage; however, ARC watchstanders will be aware of enrolled vessels in the area and ready to assist if necessary.

Notice of Hazardous Conditions: Vessels participating in the ARC Plan continue to be required to make notifications to the USCG under 33 CFR 160.215 Notices of Hazardous Conditions. The vessel should also notify ARC of reportable hazardous conditions. ARC watchstanders are ready to assist as needed.

[11] USCG MSIB 03-14 Prevention Measures/Risk Reduction Recommendations

Shipboard Preventative Measures Procedure (Enrolled Vessel)

The following measures must be followed by the ship's master whenever transiting to or from a US port through the US EEZ in the Western Alaska Captain of the Port Zone while citing the ARC-APC. Extraordinary conditions will of course allow a vessel to deviate, but notifications must be made at the earliest opportunity to the number indicated. While navigating in these waters, a vessel shall ensure a copy of these procedures and notification instructions are on its bridge.

All reports required in accordance with ARC and VTRAC notifications procedures must be made to the ARC watch center by phone (+1-907-222-7500) or SMS text (+1-907-222-7500) AND email (ops@osro.global). Note: All emails and phone calls will be returned with a receipt notification.

Specific actions required:

1. Prior to entering Western Alaska waters covered by this APC, the Master will submit a Notice of Transit (NOT) via e-mail to the ARC-APC center, with this information. Note: If notification is not made, the vessel will be contacted by the ARC watchstander upon entering the EEZ.
    a. Intended date, time, point of arrival in area, and intended route through the area
    b. Confirmation that the vessel's AIS is operational
    c. Confirmation that the Master understands the commitment to comply with ARC-APC guidelines to the extent considered safe by the Master
2. Use only Unimak, Amchitka, Amutka, or Buldir passes as created by the ATBA.
3. While in the Aleutian Islands Subarea, the master shall sail on courses to maintain position outside of the Aleutian Islands Areas to Be Avoided (ATBA) except when transiting through one of the designated passes or its approaches.
4. Approach no closer than 50 nautical miles of nearest land as demarcated by the Aleutian Islands ATBA while transiting except when approaching or departing one of the 4 passes in (2) above or entering/leaving port.
5. If the Master judges it prudent to deviate from the intended course or must navigate within the ATBA for any reason, a deviation notice must be sent (email or phone call) to the ARC-APC center indicating the course changes and the reason for the deviation.

    NOTE: FAILURE TO REPORT DEVIATIONS, OR ENTERING INSIDE 50NM WILL RESULT IN THE OPERATIONS CENTER NOTIFYING THE VESSEL, QI, AND/OR DESIGNATED PERSON ASHORE (DPA) WITH POTENTIAL CONSEQUENCE OF RESPONSE ASSET ACTIVATION.
6. Any casualty or otherwise hazardous conditions as defined in 33CFR160.204 or other event requiring reduced speed must be reported to the ARC-APC Operations Center as soon as practicable. A loss of speed will automatically prompt a call to the vessel.
7. A vessel stopping at any port in the area covered by this APC, whether scheduled or not, should comply with procedures prescribed in the applicable Sailing Directions after filing a deviation notice per item (5) above.

ARC-APC Center Preventative Measures Procedure (Watchstanders)

1. ***Designated Routing Offshore and through ARC-approved passages:*** Enrolled vessels transiting under the ARC Plan will maintain a distance of at least 50 nautical miles (nm) from land (offshore), and/or as demarcated by the Aleutian Islands ATBA, except for the two exceptions noted as follows:

    a. *As necessary for safety*. If necessary for safety reasons, a vessel may enter inside 50nm. Prior deviation requests to ARC (by phone, email, or text) are required, including reason for deviation. In any event, an automatic VTRAC notification will be generated. The ARC watchstander will communicate with the vessel and follow up with the USCG as appropriate.
    b. *Transiting through pass*es. When vessels are transiting through passes, automatic VTRAC notifications are generated. ARC will contact the vessel if the route has not previously been communicated to the ARC watchstander. Approved routes are shown in Figures 1-4.

2. ***Crossing Subarea Boundaries.*** If an enrolled vessel crosses a sub-area boundary into either the Kodiak or Bristol Bay sub areas (see Figure 5) from another sub-area, VTRAC will automatically notify the ARC watchstander. The watchstander will contact the vessel to determine the reason for the route deviation and verify that the USGC has been notified as required.

Chartlets Showing Approved Passes

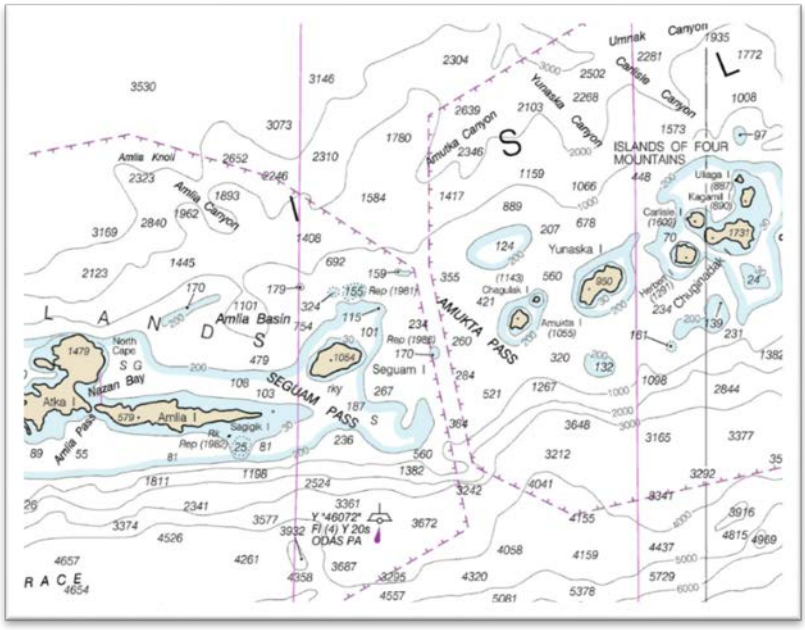

Figure 1 Amukta Pass

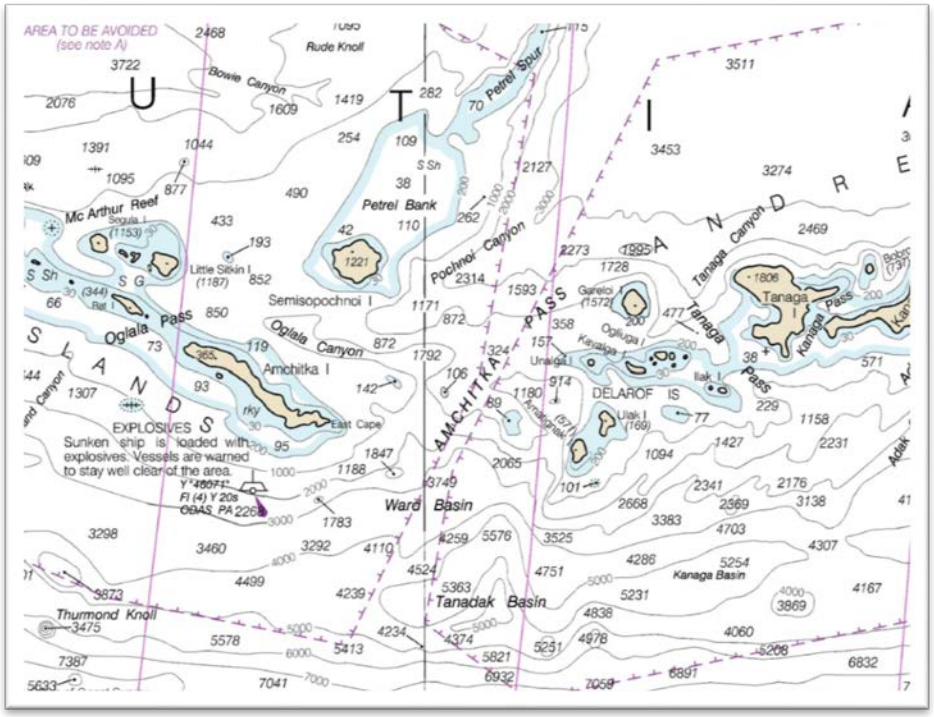

Figure 2 Amchitka Pass

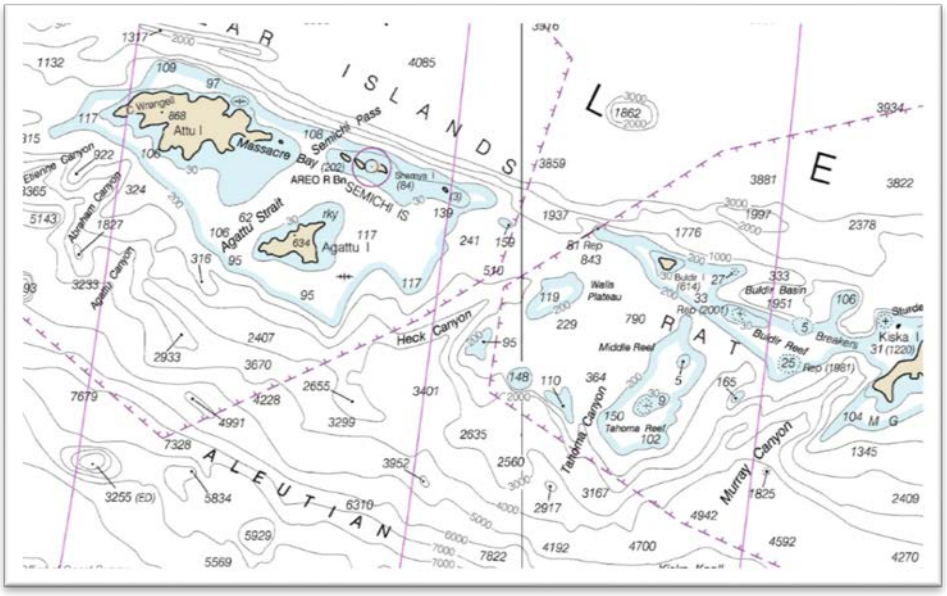

Figure 3 Buildir Pass

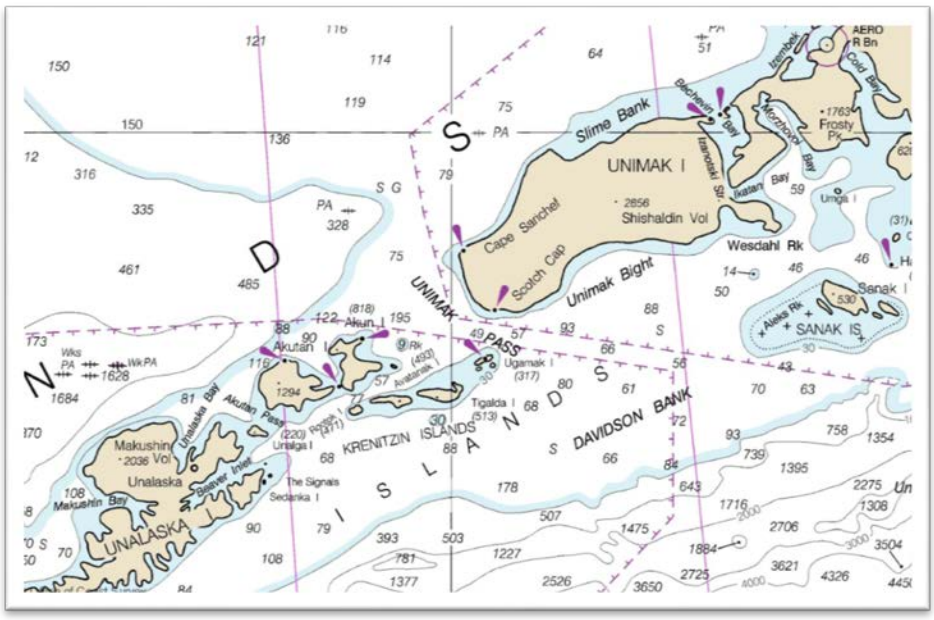

Figure 4 Unimak Pass

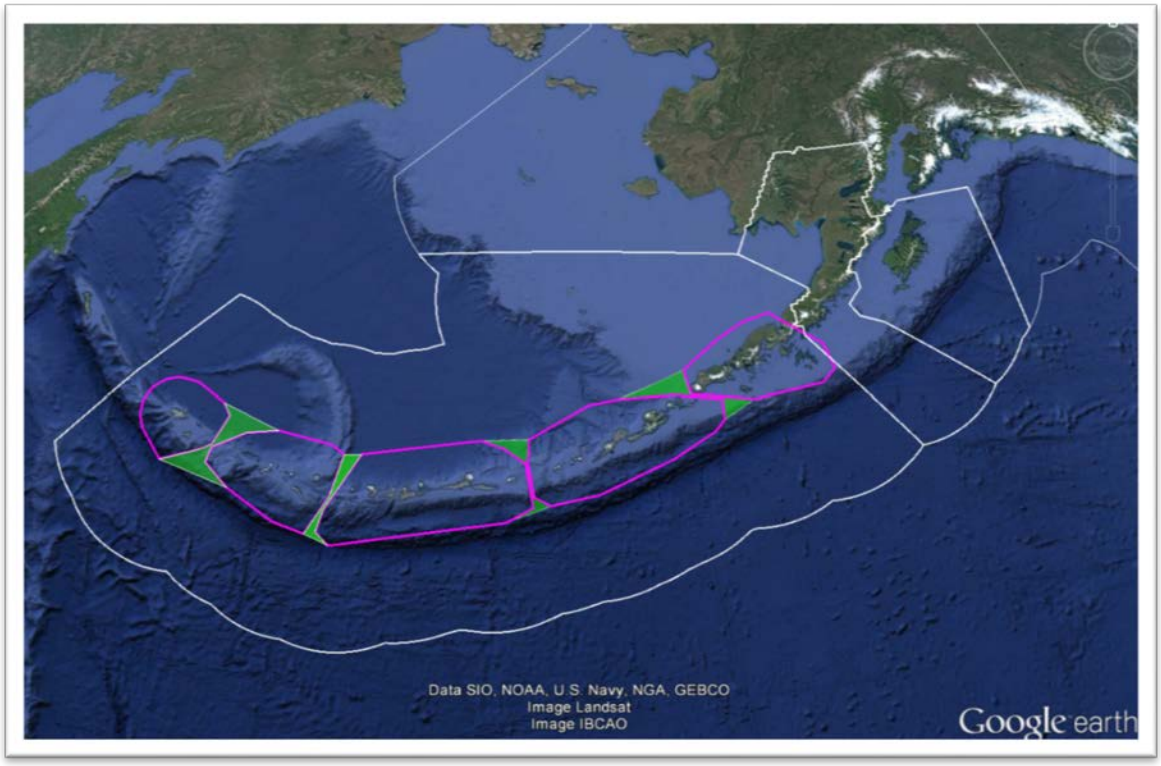

Figure 5 Great Circle Route Area Showing ATBA, Passes, and Subareas

3. ***Monitoring.*** All enrolled vessels operating under the ARC Plan are entered in VTRAC and monitored by the ARC watchstander 24/7 when they are within the boundaries of the Prevention Plan limits as described in paragraph 4 of this appendix. Vessels are required to transmit accurate information via the AIS system.

    a. Each vessel enrolled in ARC's Plan is entered into the VTRAC tool. Each vessel provides their unique vessel and 24/7 shore side emergency contact information and that of their Qualified Individual (QI) which is preloaded into the VTRAC database.

    b. Immediate contact to the vessel by the ARC Operations Center is required when:

        i. Whenever an enrolled vessel unexpectedly comes within 50 nm and/or as demarcated by the Aleutian Islands ATBA; and 24 and 12 nm of shore.

        ii. An enrolled vessel slows below 5 knots

        iii. A watchstander fails to receive at least one VTRAC location update within any 30 minute period the vessel is within the boundaries

    c. A vessel within the 50-mile limit, and/or as demarcated by the Aleutian Islands ATBA, is closely monitored by the ARC watchstander until the deviation is corrected. It is recommended that intentional deviations from routing, including the reason(s) for deviation, are communicated by the vessel to the ARC watchstander prior to triggering VTRAC alerts. ARC will coordinate and communicate deviations from established routes or approved passages to USCG and vessel notification list as appropriate.

    d. Ground-based radar on Dutch Harbor can sometimes be used to verify track information close to Dutch Harbor.

4. ***VTRAC Alerts.*** A customized email notification/alert including all unique contact information is generated by VTRAC and sent to the vessel, the ARC watchstander, and the vessel's notification list anytime an enrolled vessel:

    a. Enters the EEZ

    b. Crosses closer than 50 nm and/or as demarcated by the Aleutian Islands ATBA and 24 and 12 nm to shore

    c. Slows to a speed less than 5 knots

    d. Crosses the boundary into the Kodiak or Bristol Bay subareas.

5. An exception log is automatically generated by the VTRAC system, and emailed Alerts are tracked in the ARC Watchstander Inbox. To mitigate the potential of a watchstander missing an alert, the system is designed to initiate an auto-call to the watch stander and/or the watch duty supervisor.

6. ***Circumstances Requiring the Vessel to Notify the USCG.*** The Sector Anchorage Command Center will be contacted by the ARC watchstander to verify the vessel has made the required notification. Examples of such circumstances include:

    a. Vessel Casualty

b. Notices of Hazardous Conditions in accordance with 33 CFR 160.215. ("Whenever a vessel has a hazardous condition onboard or has caused a hazardous condition to occur…")

c. Notices that the vessel intends to deviate from the planned route and cross the boundary into the Kodiak or Bristol Bay subarea for emergency reasons

7. ***ARC Watchstander Duties.*** The ARC watchstander will monitor vessel traffic, respond to deviations, and is responsible for taking action as appropriate that could include the following, depending on the circumstances:
    a. Contact vessel master upon entry to the EEZ to determine status and planned route
    b. Monitor all ARC-enrolled vessels operating in the covered area, and log events(emailed VTRAC Alerts can be tracked in the Watchstander Inbox)
    c. If a vessel fails to generate an AIS signal for 30 minutes the Watchstander will contact the vessel, plot its position, course and speed and continue to monitor in this manner until AIS signals are again generated
    d. Respond to VTRAC alerts by contacting vessel for details
        i. If deviation is weather related, notify USCG Anchorage Command Center to assist with weathering/safe harbor recommendations
        ii. If deviation is due to vessel casualty, insure that QI has been contacted, and contact USCG Sector Anchorage to verify they have been notified by the vessel
        iii. Contact, coordinate and assist vessel's designated shoreside emergency response team as appropriate
        iv. Continue monitoring and providing ongoing assistance as appropriate until situation is resolved or handed over to QI or responsible company representative

8. Evaluate each event and contact USCG Sector Anchorage Command Center as noted above, or as deemed appropriate, and whenever a vessel is within 24 NM of land, except in approved passages.

9. Assist vessels can be categorized within the VTRAC system and can be contacted for response assistance.

ARC-APC Center Response Measures Procedure (Watchstanders)

The ARC-APC Center watchstanders are not representatives of the designated QI or the DPA. In the event there is any incident, or potential incident, as identified by VTRAC monitoring or the watchstander, the watchstander shall ensure the QI (or other person as indicated by the vessel enrollment form) has been notified.

The watchstander shall assist the QI in communicating with the vessel, the designated OSRO, and other response organizations in the area as requested by the QI and/or Coast Guard.

Pathway to Protection

Alternative Compliance
Non-tank Vessel Oil Spill Response Plan

Vessel of Opportunity Amendment 1.1

Based on USCG
Alternative Planning Criteria Guidance

Prepared by:
Alaska Response Company, LLC

February 6, 2017

AMENDMENT 1.1 – CHANGES TO VESSELS OF OPPORTUNITY LIST

A change in the MOAs pertaining to Vessel of Opportunities requires the following changes.

1. ***REPLACE:*** The following table replaces table 2 of the plan. The new table details expanded vessel availability and changes to ARC's current Revision 1 Plan.

Table 1 Response Vessels

Response Vessels in Adak OSRO		
Adak Island NOTE: This is a representative sample of boats available. This list changes but at least four are available at any given time.	25' Boston Whaler w/twin 150 HP motors 20' Alumaweld 270 HP 16' C-Dory 40HP 15' Aluminum Skiff with 35 HP 18' Boston Whaler skiff under contract 20' Boston Whaler skiff under contract	ASCI ASCI ASCI ASCI ASCI ASCI
Response Vessel of Opportunity; Western Alaska AOR		
General Location	**Vessel/Barge**	**MOU Company**
Aleutians Aleutians	Barge "Illuliak Bay" 5000 bbl self-loading barge; trading in Alaska Tug "Gyrfalcon" 2132 HP Tractor	Harley Marine Harley Marine
Cook Inlet	Tug 'Bob Francis" 5360 HP Ocean Tug; FIFI	Harley Marine
Kodiak Kodiak	2 Response Vessels, F/Vs ~43' 2 Response Vessel, F/Vs ~35'	Kodiak Charters Kodiak Charters
SE Alaska SE Alaska	Barge "Petro Mariner" 28,450 bbl ATB w/ Tug "Dale R Lindsey" 3000 HP ~10 Tank Barges (various) in Alaska-Seattle trade	Harley Marine Harley Marine
Various locations	~5 Tugs (various) in Alaska-Seattle trade	Harley Marine

2. ***DELETE:*** Paragraph text after table 2: "Agreements are in place…to load their landing craft."

   ADD "Memoranda of Agreement are in place to call upon various Vessels of Opportunity as provided in Table 2 and from time to time expanded."