

**MINUTES
HARBOR SAFETY COMMITTEE
OF THE SAN FRANCISCO BAY REGION**

**9:30 a.m., Thursday, May 14, 1992
Board Room, Port of San Francisco, San Francisco, CA**

1. The meeting was called to order by Chairman, A. Thomas, at 0935. The following committee members or their alternates were in attendance: Andrew Clark-Clough (alternate for Dave Adams), Port of Oakland; James Faber, Port of Richmond; Alexander Krygsman, Port of Stockton; Roger Peters, Port of San Francisco; Joseph Gaidick, Port of Benicia; Margo Brown, National Boating Federation; Morris Croce, Chevron Shipping Company; Dwight Koops, Exxon Shipping; John Gosling, Matson Navigation Company; Gunnar Lundeberg, Sailors Union of the Pacific; James Macaulay, Harbor Tug and Barge Company; Gail Skarich (alternate for Mary McMillan, Sanders Towboat Service; Ann Nothoff, Natural Resources Defense Council; Joan Lundstrom, San Francisco Bay Conservation and Development Commission; Captain Thomas Rose, U. S. Navy Pilots; Max Blodgett, U. S. Army Corps of Engineers and federal government members Captain J. M. Macdonald and CMDR Thomas P. Dolan, U. S. Coast Guard. Also in attendance, Peter Bontadelli, Roger Dunstan and Bud Leland, OSPR. There were also many attendees from the general public.
2. The Chair welcomed committee members and those attending from the interested public. T. Hunter noted that a quorum was present.
3. The Chair introduced Peter Bontadelli, former Director of the Department of Fish and Game and currently Administrator for the Office of Oil Spill Prevention and Response.
4. P. Bontadelli thanked committee members for agreeing to serve. He stated that his purpose in attending this meeting was to provide an update on the program as a whole. While the program is one and a half years old, in reality it has been firmly established and operative for four to six months, with staff in place. The internal goal of the OSPR office is to catch up with the goals of SB 2040 by the end of the calendar year.
5. Financial responsibility regulations fully took effect June, 1992. 1,000 vessels and 200 to 300 facilities and mobile units are on file. Interim contingency plans are on file and are currently being input in a data base. A loan program has been established through the OSPR fund to avoid direct access to financial responsibility coverage without participants having to go through P & I clubs. California has greater financial responsibility provisions than the rest of the country. With many policies having been in effect for six months, they are now at the renewal stage. Policies with renewal dates of February/March are being certified for the next year.
6. Contingency plan requirements for vessels and facilities are currently at the printer. 3,000 copies will go out and then the process of receipt of contingency plans and the reviewing of them will begin. There will be four workshops/public meetings to get input on the concepts and the numbers in the requirements document. The deadline for written input is June 22, 1992. Draft regulations will be complete in July and final regulations will be in place in September. Contingency plans will be due in late March to early June. 90 day extensions will be granted on receipt of a formal request for an extension accompanied by an interim plan and verification of financial responsibility. An implementation plan will be due six months after the contingency plan has been filed.
7. One year after the final regulations are in place, plans should be fully working, with a review of every plan required every two years.

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8. The preventative aspects of plans are to be addressed by both facilities and vessels. Facilities are required to conduct hazardous operations studies and identify the reasonable worst case and points of risk. The goal is for each facility to have under contract the appropriate number of staff and equipment to respond to the reasonable worst case with identification of additional sources for the worst possible case. Vessels will be required to identify resources to respond to the reasonable worst case which is defined as the loss of 25% of the volume of oil on board. The largest vessels will be required to identify (but not necessarily have under contract) the ability to call out resources to respond to the reasonable worst case within 24 hours and to identify additional resources. California regulations are requesting ten times the equipment which responded to the Valdez spill to be deliverable within the first 12 hours. This is an enhancement over what is currently present. It is important to establish levels which are possible or there will be a shut down of commerce. The proposed levels for 1993 are double what is available now, given the best information at hand.

9. The state regulations will build on the federal regulation process for vessels. Contractor certification programs will be instituted with federal programs working as a starting point for California. Federal regulations build on the IMO program and California will build on this program with appendices rather than establishing separate regulations. California will rely on contingency plans rather than federal response with off-site analysis of the highest risk points, identifying areas of coastline likely to be impacted in a given area. The draft regulations will include a rough preliminary coastline map with twelve points (consistent with NOAA) which will be refined over the next three years.

10. Guidance documents will do overlays of all wildlife resources, endangered species, etc. They will identify major resources at risk as well as economic areas, marinas, etc. The guidance documents will also identify coastal ownership of beaches, parks, reserves and study areas. Many of these guidance documents will not be full and complete. They will be turned over to the Coast Guard for inclusion in federal area plans. The Coast Guard and OSPR have agreed to use the same areas for division of the coast, using county boundaries so that existing programs can be used. A grant program for developing contingency plans is in place and eighteen county governments have been advised of the amount designated for them.

11. 99% of the drills to be held will be joint endeavors with the Coast Guard per a Memorandum of Understanding signed in December, 1991. Scoping meetings will include morning discussions followed by afternoon workshops. Meetings are scheduled for Eureka on June 3, San Francisco on June 4, Monterey on June 11 and Long Beach on June 12. The purpose of these meetings is to solicit public input. The goal of the scoping process is to find out if any of the concepts in the draft regulations are out of line.

12. Studies of vessel inspection programs and pilotage are underway and will be submitted to the legislature but it may not be possible to meet implementation deadlines. The pilotage study will be on the street for four months and the purpose will be to identify the status of pilotage as it now exists. In the initial phase, training programs and the similarities between the various groups will be examined. There is doubt that recommendations for change will be included in the first report. Rather, it will look at the attitude of the maritime community towards pilotage in each port. The emphasis will be on the current view. The next step will be to compare the various programs. The Los Angeles/Long Beach Harbor Safety Plan includes a couple of recommendations in connection with the pilotage issue which will be revisited in the second year of the committee's work. It is impossible to reach conclusions on the more controversial issues in the short run.

13. A Vessel Traffic Service will be established in Los Angeles/Long Beach with upgrades planned for San Francisco Bay. If the federal agencies/Coast Guard will do it, state action won't be needed.

14. Lightering/bunkering regulations will be out in one month and will outline clean-up equipment which must be available. 71% of all spills happen during these operations and 90% involve 50 barrels or less. The aim is to immediately address these operations and spills of 50 barrels or less.

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15. Planned drills will be cooperative efforts of the Coast Guard and a fully staffed OSPR office. Next week OSPR will conduct its first internal drill to get communications equipment up and make sure personnel understand their roles. Future drills will be integrated with ARCO (June), the U. S. Coast Guard (September) and the Mexican Coast Guard (December).

16. The work of the Harbor Safety Committees, which now number five, falls within the purview of prevention. The fifth and final committee was established in San Diego last month. OSPR is about to finalize the regulations for committees, having determined that it was appropriate to wait until the San Diego committee was in place and had a chance to input. Monday (May 13) the regulations will be forwarded to the Office of Administrative Law.

17. OSPR will be sending out a set of procedures and background information to outline how recommendations will be handled as they are received from the various committees. They should be out in two or three days.

18. OSPR has accepted the Tug Requirement Guidelines as submitted by this Harbor Safety Committee. After guidelines/plans are submitted to the Administrator, there is a 30 day period for his review and initial comment. It is expected that most will be acceptable upon receipt, if not the Administrator will forward his notations/recommendations to the respective committee. Each committee will be asked to provide, within 45 days, rationale and background information on alternatives which were reviewed and considered but not included in the plans themselves. Once the rationale and background information has been received and accepted, there will be a 15 day period for public review. During this period, a joint public hearing held by the respective Harbor Safety Committee and its designated OSPR representative. The OSPR representative will then work with the Harbor Safety Committee on a joint response. A list of possible deficiencies will then go back to the Harbor Safety Committee from the Administrator and the committee will hold a public meeting to determine if the plan as originally submitted requires any changes. Public input is important to be certain that the impacted public has a chance to be involved. The public participation (audience) for the San Francisco meetings are significantly greater than that for any of the other four committees.

19. The resultant final submission of the plan will then go to the Administrator and the formal regulation process begins. The Los Angeles/Long Beach Harbor Safety Plan and the San Francisco Tug Escort Guidelines are the first documents to be put through this process.

20. P. Bontadelli distributed a letter from OSPR stating that the office was prepared to accept the report with four areas needing added clarification. That letter is hereby made a part of these minutes. A follow-up letter will request beefing up of the rationale. The next 45 days should be used to develop the rationale and answer the four questions raised in the letter.

21. P. Bontadelli's goal is make two or three visits each year to each Harbor Safety Committee. The legislation has given the right to divide the coast into areas, but not to create a significant competitive disadvantage between these areas. The floor was opened to discussion.

22. J. Mes, Transmarine Navigation, stated that he has two problems with the state's process of receiving certifications of financial responsibility. First, the state doesn't know what it has, i.e., state personnel cannot locate file documents which have been properly submitted. Second, will anyone ever review the interim contingency plans and give feedback? P. Bontadelli responded to the first question that the input to the data base for certifications of financial responsibility is nearly complete. One problem staff has had in locating particular documentation is that many companies filed fleet plans and didn't identify the individual vessels involved and some companies filed financial responsibility documentation but no interim contingency plans because they aren't required yet. The goal is to cross reference all the data on two or three points. Staff is working overtime inputting financial responsibility information into the database and it should be ready for access in a week or two. The quality of the

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to date range from excellent to weak. In some cases the personnel identified as responsible for implementation of the plan in Hong Kong or Singapore. In other cases the same contractor has been identified as being responsible for San Francisco and San Diego or the listed contractor is unaware that they have been listed. OSPR is in the process of developing regulations on these issues to require that the contact person for implementation be in California and that a contract be in place to demonstrate ability to perform. These new regulations are expected in September. In response to the second of J. Mes' points, some notices have gone out requesting changes in interim contingency plans, but there needs to be a regulation in place to enforce compliance with these requests. The Humboldt earthquake activated the emergency procedures process at the OSPR office because of the amount of oil in the area, more than was involved in the Valdez spill. OSPR staff looked at what was on file for the area and identified who to contact.

23.A. Nothoff asked about a study concerning protection of the coastline outside the five designated areas of OSPR response. P. Bontadelli responded that it will take time to balance everything once the plans are on file; there will be seven areas of concern in agreement with those defined by the Coast Guard. There is a requirement that there be a public hearing for each of these seven areas and a plan to be filed by 3-93, with full implementation by 9-93. During the time between filing and implementation, private resources will be identified. The area planning process that the Coast Guard has underway will identify public resources.

24.The best available protection will be achieved by identifying the gaps and filling them with private equipment and public procurement. Borrowing from the federal level, P. Bontadelli noted that the Coast Guard divides the waters into six areas around the country, four apply to California and are designated by buoy markers: inland waters; near shore waters (0 - 12 miles); offshore waters (12 - 50 miles); and open waters (50+ miles). Any vessel operating in inland or near shore waters must have a state contingency plan as it is assumed that a spill will impact the California coastline. Any vessel operating in offshore waters must have a state plan unless they can demonstrate that a spill would not impact state waters. This will give strong incentive for vessels to stay outside the 50 mile perimeter. All WISPA tankers will stay outside the 50 mile radius until they are ready to enter a port. A contingency plan must involve prevention and response, outlining bridge procedure, communications, etc. Federal regulations are being incorporated into state regulations by reference when they meet state standards. Each contractor must have on file a plan which includes trajectory and methods of deployment. The plan must have four phases: open water, close to shore, shoreline protection and shoreline clean-up. It must include a matrix of processes and these must be under contract with the shoreline identified. California's regulations are doubling the federal requirements for available response equipment in high volume areas, using federal definitions where they will work and adopting the format with California appendices.

25.The Chair thanked P. Bontadelli for the completeness of his report.

26.Minutes of previous meeting were corrected. J. Macaulay noted that the Los Angeles/Long Beach Harbor Safety Plan did not develop air draft regulations, only under keel requirements (p. 3, sec. 14). P. Bontadelli noted for the record that the same letter of acceptance is going to Los Angeles/Long Beach Harbor Safety Committee for their plan as is coming to this committee for the Tug Escort Guidelines. MOTION by J. Lundstrom to approve the minutes as corrected; seconded by J. Macaulay. Motion passed.

27.PLAN SUB-COMMITTEE, A. Nothoff distributed a full working draft of the plan to each committee member and made available to the public copies of the draft minus the appendices. She also distributed a copy of the draft regulations the sub-committee is trying to meet and comply with, dated 4-6-92. A. Nothoff, along with J. Lundberg and P. Moloney, have reviewed all committee reports for inclusion in the plan. It appears that with the 45 day period for review, the full plan and the Tug Escort Guidelines may be submitted at the same time. The sub-committee needs more input to identify the volume of oil moved through the area. J. Lundstrom was able to get figures for military vessels, the data for commercial movements is lacking. Page 41 of the draft identifies four chapters for which there are no sub-committee reports. A. Nothoff asked if there is a specific contact person at

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OSPR for the pilotage study. P. Bontadelli responded that Bud Leland is the point person for the pilotage study and is also the OSPR liaison to this committee.

28. Regarding the process for review of the Plan Sub-Committee's report/draft plan, A. Nothoff would like to plan for a review meeting of interested committee members for Thursday, May 28. A. Thomas offered the meeting room at the San Francisco Bar Pilots' offices. T. Hunter asked if it would be necessary to mail the extensive draft to the entire mailing list while noticing the meeting. P. Bontadelli responded that it should be available at the meeting and available upon request between now and then.

29. J. Lundstrom noted that there will be four color maps included in the plan and she would like feedback on them. The maps are on computer and are easy to edit so interested members should mark up copies with suggestions. The first will show the scope of the plan. The second will show the geographical areas established in the Tug Escort Guidelines. The third map will show marine terminals. If any sub-committee members need maps in varying sizes for committee work or public meetings, please let J. Lundstrom know. J. Macaulay suggested that a map of current and proposed VTS coverage be included.

30. J. Mes asked why limit the geographical scope of the plan no farther than Redwood City. A spill at Anchorage 9 would spread to San Jose on a flood tide. He also noted that the Petaluma and Napa Rivers are navigable waters at high tide. P. Bontadelli responded that we will take the definition of "inland waters" and use that to define inland boundaries; outer boundaries can be extended if it can be justified. Incentives can be created to affect routing, but you can't regulate beyond that which you can justify. The Light Horn Buoy is now the outer limit. A. Thomas commented that the Tug Escort Guidelines were instrumental in defining outer boundaries; the federal definition for inland boundaries is a practical concern. J. Lundstrom requested that suggestions to the Plan Sub-Committee be made in writing.

31. The Chair accepted the interim draft report with maps. T. Hunter will notice the public Plan Sub-Committee meeting.

32. TUG ESCORT SUB-COMMITTEE, R. Peters. The sub-committee was charged at the last meeting to solicit the services of a Naval Architect to develop a formula relating bollard pull to horsepower. They found that there were seven logical choices for the solicitation. To date five proposals have been received. The sub-committee met on May 3, with 15-20 in attendance. The consensus was that there were two highly qualified firms among the five. On the face of the proposals the sub-committee was not able to make a final decision. One firm is based in Canada and the sub-committee was not sure of authorization to contract outside the state/country. The second firm is based in Seattle. One of the firms was not willing to visit the Bay Area within the \$2,500 budget for the contract. R. Peters has contacted the firm and requested that they counter to come here on a pro bono basis. At this time the sub-committee has no recommendations and is trying to resolve these two open issues.

33. T. Hunter reported that two members of the Marine Exchange staff are going to Los Angeles to video tape the bollard pulls being conducted there.

34. A question from the floor concerned whether the contract would be let out without a full committee vote. R. Peters responded that he understands the sub-committee is to make a recommendation to the Marine Exchange.

35. A. Nothoff asked if it is reasonable to expect a scientifically based formula to relate horsepower to bollard pull, vessels to tugs, will be available in time for inclusion in the plan. R. Peters estimated that the report would be completed by late June or early July. P. Bontadelli noted that OSPR procedure gives a period of 45 days to modify

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the plan, then OSPR could initiate a public hearing and include that formula. Then the plan would come back to this committee for review. He will see if the contract can be made as an amendment to the contract in place. R. Peters stated that the sub-committee would be comfortable with the naval architect's report going to the state without sub-committee review. P. Bontadelli can do an internal review prior to public comment.

36.A. Nothoff questioned whether it would undermine the regulations if the rules change in 30 days. A. Thomas responded that the requirements in the Tug Escort Guidelines are bare minimums. Tug operators and vessel operators understand that they wouldn't be in place very long.

37.The Chair accepted the Plans Sub-Committee report.

38.VTS SUB-COMMITTEE. D. Koops noted that there was a meeting held to address bridge to bridge communications and protocol technique. M. Croce has received adequate feedback from that meeting. A. Nothoff asked CMDR Dolan about the Coast Guard's request to upgrade the system. He responded that it has gone to M. Croce and the language and terminology has been brought into conformance with that from other areas. There has been a 120 day extension of the moratorium on federal regulations. A. Thomas noted that an International VTS Symposium is being held in Vancouver, Canada, in June; he will be attending. There may be information gathered at this meeting; the U. S. Coast Guard is not in complete accordance with the international conventions.

39.ENFORCEMENT SUB-COMMITTEE, J. Mes. The sub-committee has not met since the last full committee meeting. He referred to a Memorandum of Understanding between the Coast Guard and the State Lands Commission, asking if the Coast Guard would be notified by State Lands in the event of a violation. P. Bontadelli responded yes. J. Mes asked if this MOU and its implementation has resulted in a vessel stopping loading or discharging because it was in violation. The response was that, to date, in each case of violation, the information was received prior to the act, the potential violator was contacted and corrections were made prior to loading or discharge. J. Mes asked if, like State Lands, Fish and Game calls the Coast Guard to communicate information regarding violations. P. Bontadelli responded that Fish and Game, unlike State Lands, has the authority to enforce regulations. The task of enforcement in a given case will go to the most readily available personnel, whether it be Coast Guard or Fish and Game. The details are being worked out with the Coast Guard now. J. Mes asked about monetary penalties. P. Bontadelli answered that if a violation of federal regulations occurs, penalties will be handled on a federal level. When state regulations are in place, the state will administer penalties for violations of state regulations. In any case, a violation and resultant penalties will be handled in accordance with the most efficient method of correction and penalty.

40.J. Mes noted that San Francisco does not have port tariffs in place like Los Angeles. In this area, we must use the Coast Guard, State Lands or Fish and Game as the enforcement authority. P. Bontadelli added that he would prefer to supplement what the Coast Guard has in place. Fish and Game has a lack of personnel for enforcement and would need to contract with the Coast Guard rather than reinvent the same system. D. Koops stated that Air Quality Control and Coast Guard personnel/inspectors are on board vessels all the time and, while there is a desire to cooperate on the part of ship owners, their presence and the accompanying activity creates a diversion of attention among crewmembers, causing some concern. A. Thomas responded that, ideally, there will eventually be only one inspector; procedures are still in developmental stages. P. Bontadelli reported on a Memorandum of Understanding dated 4/8/92 with State Lands that will help to delineate areas of attention. The task of vessel inspection rests with the Administrator not State Lands, but he may designate State Lands to enforce. Fish and Game personnel are learning from Coast Guard inspectors. D. Koops acknowledged that the number of personnel currently involved in going on board for inspection includes a number of people in training programs. B. Cappasso asked if inspection/enforcement will be applied to tugs when the regulations are implemented. A. Thomas responded that it is the intent of the Tug Escort Sub-Committee to address inspection after the regulations are implemented with the initial work done on those vessels that carry petroleum. B. Cappasso asked that the record reflect that the tug companies are actively seeking inspection.

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- 41.P. Bontadelli stated that the definition of enforcement will fail to Fish and Game. The Coast Guard and Fish and Game can act as each other's agent and can enforce each other's regulations. The purpose of what is being put in place is that both agencies' inspection personnel use the same checklist. In the event of a citation, it will be designated whether a federal or state regulation has been violated. J. Macaulay asked if we, on a state level, want to inspect. P. Bontadelli responded that the goal is to have state regulations that are acceptable to the Coast Guard. He doesn't expect to find conflict between state and federal regulations in California. We are still looking at a many month process to final regulations. Cross deputization would mean "extra eyes and ears", with an inspector citing under whose regulations a violator is being cited. State Lands can make recommendations. The Coast Guard or Fish and Game must do the actual write up of a violation. P. Bontadelli noted that he is hearing that most problems are being corrected on the spot. The goal is compliance, not citations. The Coast Guard is the primary federal agency and Fish and Game the primary state agency, with a MOU to describe operational concerns. The Chair accepted the Enforcement Sub-Committee's interim report.
- 42.PILOTAGE SUB-COMMITTEE, A. Krygsman. The sub-committee has not been able to meet. An attempt will be made to time the sub-committee meeting so the reports on pilotage from the Administrator and the Pilotage Sub-Committee can be compared.
- 43.Lt. S. Schroeder gave the CAPTAIN OF THE PORT'S REPORT for Captain J. MacDonald. There was a 500 gallon spill at Pier 64; corroded pipes were responsible and they were cut and capped.
- 44.OLD BUSINESS: J. Lundstrom asked if the letter written by Congresswoman Nancy Pelosi regarding support for PORTS had been received for distribution. A. Steinbrugge, Marine Exchange, will distribute it with the next agenda of meetings. A. Thomas is in receipt of a letter from P. Bontadelli stating that OSPR is declining to go on the PORTS study, viewing it as a federal issue. P. Bontadelli added that, if the committee should want to go back to OSPR on the matter, there would need to be a contract for the state to change federal charts. He noted that EPA has a modeling project in process and asked if it could be used to supplement current data. He added that the Coast Guard is doing an in-depth study, perhaps we can attach to that; and the Corps of Engineers has studies in process regarding dredging. He asked if there is a way to draw information from these federal studies. A. Thomas responded that these studies do not gather and integrate the particular wind, current and tidal information needed.
- 45.A. Thomas distributed a letter from Chevron regarding tests to determine the safety of bunkering operations at Oakland and the San Francisco Bar Pilots' response. Chevron and M. Croce, in his absence, were commended for their attention to safety before the fact.
- 46.G. Lundeberg stated that, in looking over the draft plan, he feels it skirts over the November/December discussions of dredging. He reported that on May 21 the Army Corps of Engineers will appear before BCDC in connection with the 38 foot project for Oakland. He distributed a sample letter of support to BCDC and Congressman Ronald Dellums along with the names and addresses of all members of BCDC. He stated that BCDC is the final governmental entity standing in the way of the project. A. Thomas stated that he will be in attendance at that meeting and will encourage others to attend the 1:00 meeting at 455 Golden Gate Avenue, 1st Floor, San Francisco. J. Lundstrom noted that the matter is on the agenda for approximately 2:30 or 3:00. She added that, back in 1990, BCDC did approve dredging to 38 feet with a 40 foot turning basin; but it got hung up in court because of the ocean dumping of dredged materials off Half Moon Bay. She stated that now 12,000 sq. yards of contaminated dredged materials are to be deposited at Port Sonoma to dry out and become land fill. The remaining dredged materials will be dumped at Alcatraz. She said that letters of support for dredging could be sent directly to BCDC and they would copy and distribute them to the members. G. Lundeberg stated that he has an economic perspective as a labor member; he urged all in attendance to write. A. Thomas added that 21 years ago, when he was first a pilot, he worked on a channel improvement project which the participants thought would take 10 years to implement and it still has not happened. J. Lundstrom responded that the issue is not dredging, but, rather, it is disposal.

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47. The next meeting is scheduled for June 18, 1992, at 9:30 a.m. at the Marina Bay Boathouse, 2580 Spinnaker Way, Richmond.

48. Meeting adjourned at 11:55 a.m.

Respectfully submitted,

Terry Hunter

Terry Hunter
Executive Secretary

DEPARTMENT OF FISH AND GAME

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May 13, 1992

Captain A. J. Thomas, Chairman
Harbor Safety Committee of
the San Francisco Bay Region
Fort Mason Center, Suite 325
San Francisco, California 94123-1380

Dear Captain *Thomas*:

Upon review of the Guidelines for Tug Escorting, dated March 12, 1992, I would like to take this opportunity to outline the initial process by which the guidelines shall become effective regulation and to make some preliminary comments on the content of the guidelines.

To initiate the regulatory process, the Office of Oil Spill Prevention and Response will conduct a public meeting to address tug escort requirements. I have included a copy of the procedures we will be using for the review of both the harbor safety plan and the tug escort guidelines.


Following are some specific comments we would like to see discussed at the workshop:

1. To more clearly describe geographic scope, the zone descriptions should be amplified to indicate that these zones encompass such areas as the Oakland Estuary and Richmond inner harbor.
2. The barrel equivalent of 5,000 metric tons should be added to the definition of "regulated vessel".
3. Regarding the overriding of tug escort requirements, it would be best to include a brief description of what is meant by "bonafide emergency". In addition, I would like to consider a mechanism by which the captain of the port through vessel transfer system, makes prior approval of deviations from the tug escort requirements.
4. A brief description of the means by which the formula was adopted for matching tugs to vessels will be invaluable in implementation.

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Thank you, and the Tug Escort Subcommittee, for your diligence and consideration. If you have any further questions please contact me at the letterhead address or telephone, or contact Mr. Roger Dunstan, Assistant Deputy Administrator, at telephone (916) 327-9937.

Sincerely,


Pete Bontadelli
Administrator
Office of Oil Spill Prevention
and Response