

Mobile Facility Oil Spill Response Plans

Chapter 173-180 WAC Rulemaking Workshop Handout

Updating mobile facility oil transfer response plan requirements

Updating oil spill plan requirements for mobile facilities strengthen the preparedness of the regions's response community. Through this preliminary draft, we hope to better understand where oil transfers occur and where equipment is located to support a response. This preliminary draft provides more specific oil spill drill requirements, allowing us to further evaluate the mobile industry's response readiness. By strengthening the rule, the Department of Ecology (Ecology) seeks to minimize the risk and impact of a spill by ensuring containment measures are in place, effective communication is being practiced, and recovery equipment is readily available.

What is a mobile facility?

Chapter 173-180 WAC defines a mobile (or "Class 2") facility as a railroad car, motor vehicle, portable device or other rolling stock, while not transporting oil over the highways or rail lines of the state, and used to transfer oil to a nonrecreational vessel. Mobile facility is also the term used under 33 Code of Federal Regulations (CFR), Subpart F. This is the federal rule that regulates mobile facilities transferring oil to a vessel with a capacity of 250 barrels or more.

Oil transfer response plan content

Currently, Chapter 173-180 WAC asks that oil transfer response plans approved by Ecology meet the requirements of 33 CFR Part 154, Subpart F, with a few additional state-only requirements. In 2007, Ecology wrote the rule to ensure consistency between state and federal regulations. With this preliminary draft rule language, instead of referring to the CFR, we are writing plan content requirements in plain language. This should make it easier for mobile operators to comply.

Oil spill drills

Oil spill drills help the plan holder, Ecology, and response personnel understand the strengths and weaknesses of response plans, equipment, and procedures. Successful drills will reflect the quality of well-written and functional response plans. Acting on lessons learned from drills can improve the usability of response plans during an actual incident.

Drills are included in the current rule, though Ecology might not have conducted drills with you for your mobile facility. The current rule explains how Ecology may conduct unannounced drills, while recognizing that you probably also follow the National Preparedness for Response Exercise Program (PREP).

With this preliminary draft rule language, Ecology intends to build a collaborative equipment and tabletop drill program with mobile facility plan holders. Rather than focusing on unannounced drills, plan holders and Ecology would work together to schedule, design, and evaluate drills using PREP guidance.

Transfer locations

In the federal rule, the language regarding transfer location descriptions is vague. With this preliminary draft rule language, we ask for a more specific description of transfer locations. The draft includes requirements for transfer locations to be more specifically described so that we can determine where bulk oil is transferred to vessels. This will also tell us if there is sufficient equipment nearby to meet the requirements of WAC 173-180-220 through WAC 173-180-222.

Initial response and containment equipment

This preliminary draft rule language clarifies the requirement for response plans to describe how response and containment equipment under WAC 173-180-220 through WAC 173-180-222 are accessible to each transfer location, within the given timeframes. Ecology seeks to understand how equipment would be accessed and deployed in each location where transfers to vessels occur. Plan holders can improve their spill readiness by including a detailed description of deployment procedures in their response plan, which would be tested at drills.

Primary response contractors – state approved

With this preliminary draft rule language, plan holders will be asked that contact information for a state approved response contractor be included in the plan for activation, in the event that that a spill exceeds a plan holders response capabilities. Knowing who to call if a large spill occurs will help you be ready for a worst case incident.

Related information

- Ecology Rulemaking Website: [WAC 173-180 & WAC 173-184 - Washington State Department of Ecology](#)
- 33 CFR. Part 154, Subpart F: <https://www.ecfr.gov/current/title-33/chapter-I/subchapter-O/part-154/subpart-F>
- [National Preparedness for Response Exercise](#) Program
- List of [state approved contractors](#)



Nora Haider
nora.haider@ecy.wa.gov
425-247-6588



To request an ADA accommodation, contact Ecology by phone at 360-584-4490 or email at brittany.flittner@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>. For Relay Service or TTY call 711 or 877-833-6341.