

NRC WA PRC Application

March 16, 2026

Attachment F-5

Dispersants Program

NRC's program to meet WAC 173-182-325 – Planning Standards for Dispersants – provides both aerial and vessel based dispersant application capabilities. Currently NRC has five (5) Dispersant Aircraft under contract, including two (2) located on the West Coast. All aircraft are outfitted with FAA approved dispersant spray systems and supplies and are contracted for take-off within a maximum of 3 hours from notification. NRC also has 22 Vessel Spray Systems for use by NRC OSRVs and/or Vessels of Opportunity, including an Ayles Fernie BS-100 system located in Washington State. NRC dispersant systems have been manufactured according to ASTM standards. Aircraft are certified by a third-party and will be utilized in accordance with manufacturer specifications during the deployment of dispersants. NRC maintains dispersant application systems in accordance with applicable industry and manufacturing guidelines. Maintenance files for Washington based systems are located in NRC Seattle office.

NRC maintains prepositioned stockpiles of Accell Clean DWD 2.0 and Finasol OSR 52 dispersant, considered non-hazardous for land, marine, and air transport per its MSDS, at various locations throughout the United States. These stockpiles provide a dispersing capability in excess of 12,000 barrels per day in Washington State, using a dispersant to oil ratio of one to twenty. NRC dispersant resources are fully cascable and capable of being on-scene within twelve hours of spill notification.

NRC maintains several LOIs for aerial support equipment, including fixed-wing and helicopters, providing coverage throughout Washington State. In addition, has access to over 70 Spotter Aircraft throughout the United States located at 48 different Aircraft Staging Bases through its Aerial Subcontractor Network (CAN). All aircraft staging bases have been vetted to accommodate the specifics of NRC contracted aircraft, including runway composition and length, as well as optimal proximity to possible spill event sites. Several of these aircraft are capable of responding throughout Washington State within 3-12 hours. See "Attachment F-12 – Aerial Surveillance" for details.

NRC can provide aerial observation with its own trained spotter personnel. Several NRC personnel have completed the Aerial Oil Surveillance Training provided by U.S. Coast Guard (USCG) D13 – District Response Advisory Team (DRAT), including NRC personnel based in Washington State. NRC also maintains vendor relationships with scientific consultants for the provision of dispersant application monitoring and analysis. Monitoring of dispersant application will be performed visually and efficacy will be evaluated through analysis of sampling performed as required by scientific consultants.

NRC dispersant operations will be conducted following the policies in the NWACP and pursuant to direction by the FOOSC, the NRC Health and Safety Program, the NRC Dispersant Operations Plan, the applicable Incident Action Plan and applicable Site Safety Plan. NRC Safety, Aerial Operations, Staging and Logistics personnel will be mobilized as needed. See the attached "NRC Compliance USCG Dispersants Program" for a complete listing of type and locations of aircraft, application

systems, dispersants and additional program details. See the NWACP Dispersant Policy Map located at <https://waecy.maps.arcgis.com/apps/webappviewer/index.html?id=ff1d0cd00e6641209e25b9ee56df46fc>.

Environmental, Industrial & Emergency Response Solutions

NRC Compliance USCG Dispersants Program



March 2026



Dispersants / On-water Oil Removal Capacity (CAPS)

- **September 30, 2009** the U.S. Coast Guard (USCG) Final Rule for CAPS had been published:
 - ✓ Vessel and Facility Response Plans for Oil: 2003 Removal Equipment Requirements and Alternative Technology Revisions
 - 33 CFR Part 154 Facility Response Plans for Oil
 - 33 CFR Part 155 Vessel Response Plans for Oil

- Establishes equipment capability limits (CAPS)

- Required by contract or other approved means

- Enhances the existing response requirements by requiring contracts for:
 - ✓ Dispersants and related delivery equipment
 - ✓ Aerial tracking / trained observation personnel

- Objective: to increase pollution response preparedness before oil spills occur to mitigate the possible environmental harm

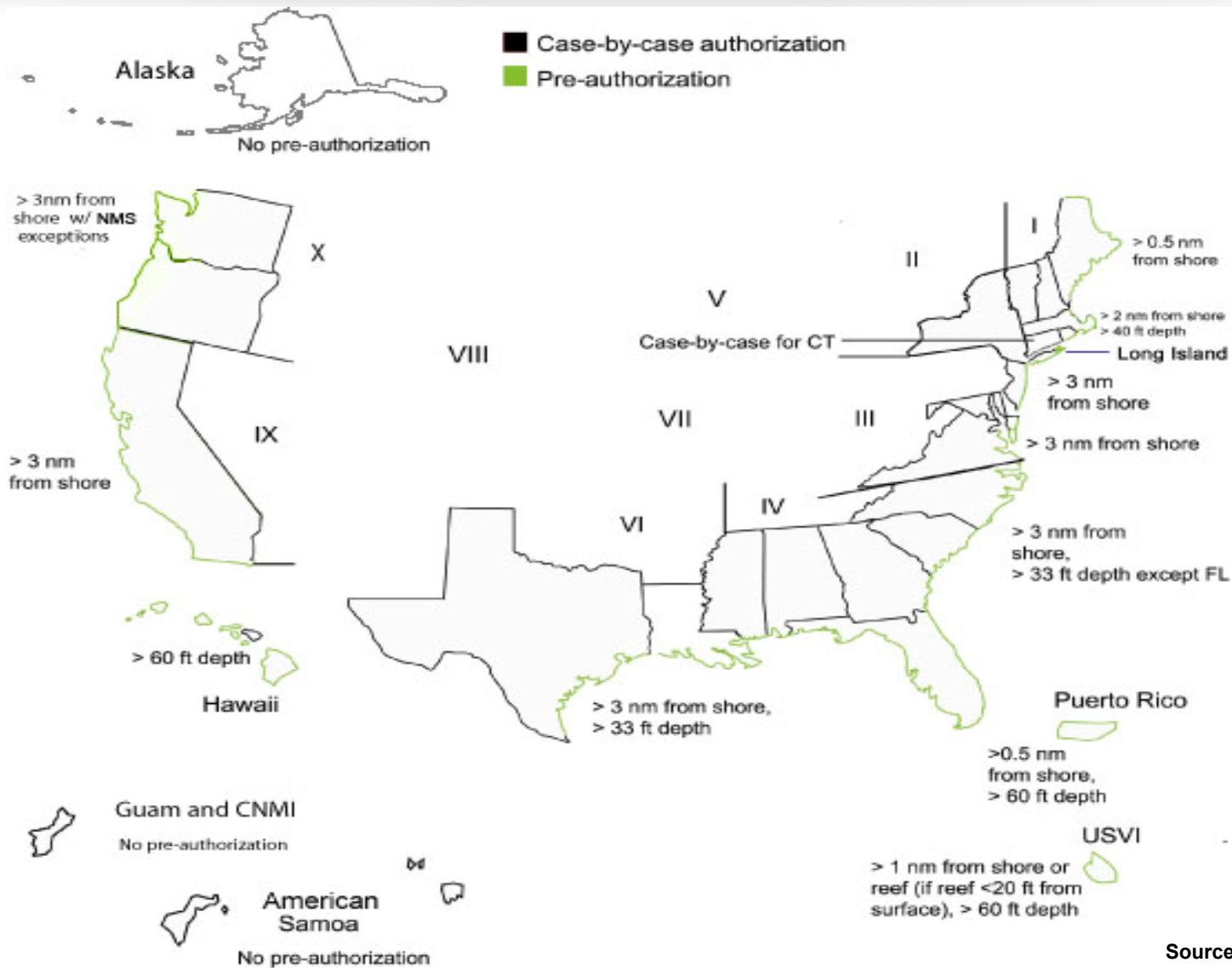
“CAPS” Dispersant Regulation

- Effective on **February 22, 2011**
- Based on NRC’s Alternate Planning Criteria (APC) approval, the USCG issued Interim Operation Authorization (IOA) letters to plan holders which are set to expire **August 21, 2011**.
- Dispersants complement existing mechanical recovery capability
 - ✓ Dispersant access via owned or contracted resources
 - ✓ Dispersant stockpiles required in all areas where pre-authorization has been established
- Aerial tracking and trained observation personnel for efficient use of mechanical recovery and dispersant resources
 - ✓ This includes vessels operating in areas without dispersant preauthorization
 - ✓ Vessels operating exclusively on inland rivers are **not** required to have aerial tracking

Highlights of New Final Rule

- Applies to plan holders operating in pre-approved zones
- 50% of dispersant Effective Daily Application Capacity (EDAC) must be achieved through fixed wing aircraft
- Federal On Scene Coordinator's approval of dispersant use
- Dispersant application must be completed within window of 7 to 12 hours to meet all Tier requirements
- Aerial tracking capability is to arrive on-scene prior to dispersant use and will:
 - ✓ Provide info on spill location, size, and trajectory
 - ✓ Provide guidance to response assets, including recommendations for response tactics
 - ✓ Evaluate effectiveness of dispersant application through continuous aerial tracking

Dispersant Pre-approval Zones

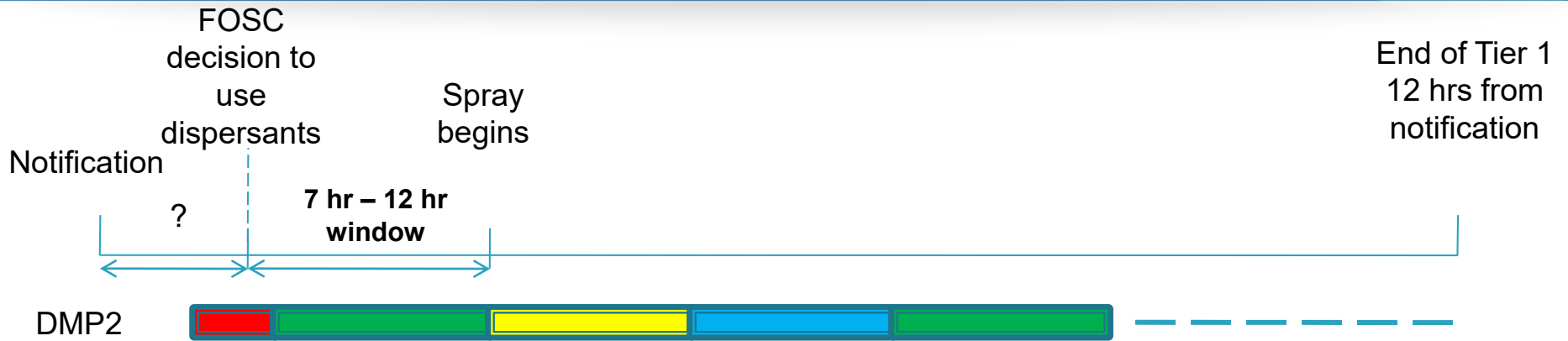


Tiers for Effective Daily Application Capability (EDAC)

Region	TIER 1 (Day 1)	TIER 2 (Day 2)	TIER 3 (Day 3)
Gulf Coast	8,250 gallons of dispersants (197 bbls)	23,375 gallons of dispersants (557 bbls)	23,375 gallons of dispersants (557 bbls)
All Other Regions	4,125 gallons of dispersants (98 bbls)	23,375 gallons of dispersants (557 bbls)	23,375 gallons of dispersants (557 bbls)
Response Time for Completed Application of Dispersant (hrs)	12	36	60

Dispersant application operations should commence within 7 hrs of decision by FOSC

EDAC Tier 1 Timeline



Cascade including mobilization, transit to Primary Dispersant Staging Site, transport of dispersant stockpiles to staging site, crew briefing



Taxi, takeoff, travel time to spill site, check in with aerial observer, approach



Spray pass, U-turn, etc. until payload is expended

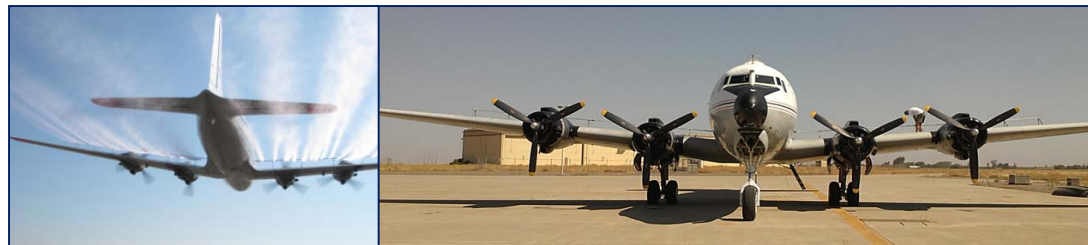


Transit back to staging, land, taxi, load fuel/dispersant

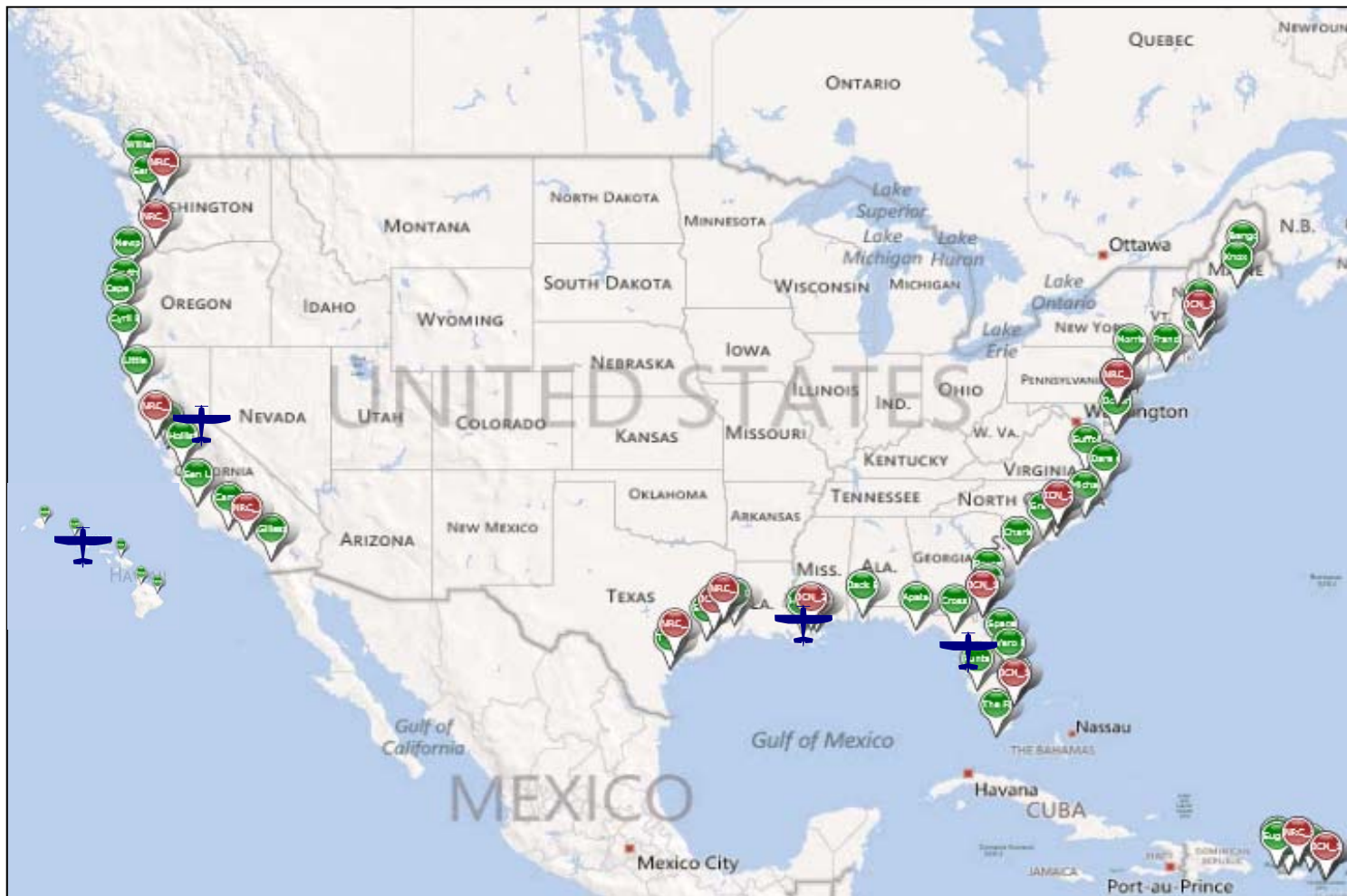
- Aerial-tracking resources arrive by hour 7
- Tier 1 assumes that daylight begins upon notification and ends at hour 12

NRC Dispersant Aircraft Inventory

Location of Dispersant Aircraft	Type of Aircraft	Storage Capacity	Quantity
Atwater, CA	DC - 4	2,100 gal	1
Opa-locka, FL	Convair	1,500 gal	3
Kapolei, HI	DC - 6	3,310 gal	1
TOTAL AIRCRAFT			5



Aircraft Inventory & Staging Bases



 Spray Aircraft Locations  Dispersant Locations  Aircraft Staging Bases

Aerial Observation

- Observation Personnel must be trained in:
 - ASTM assessment techniques – “Standard Practice for Reporting Visual Observations of Oil on Water”
 - Expertise in the estimation of slick size, thickness, and quantity
 - NOAA’s “Open Water Oil Identification Job Aid for Aerial Observation”
 - NOAA’s “Characteristic Coastal Habitats” guide

- Aerial Observers should also be:
 - Capable of supporting oil spill removal operations continuously for three 10-hour operational periods during the initial 72 hours of the discharge
 - NRC personnel have completed Aerial Oil Surveillance Training provided by U.S. Coast Guard (USCG) D13 – District Response Advisory Team (DRAT)

Aerial Contractor Network (ACN)

- NRC's clients have access to over 70 Spotter Aircraft throughout the United States.
- 48 Aircraft Staging Bases
 - ✓ All aircraft staging bases have been vetted to accommodate the specifics of NRC's contracted aircrafts, such as runway composition, runway length and optimal proximity to possible spill event sites.
- NRC is continuously expanding its capabilities and response effectiveness through the continuous growth of ACN.

Vessel Spray Systems

QTY	Make	Model	Type	Location
1	Ayles Fernie	BS-100	AFEDO	Miami, FL
1	Ayles Fernie	BS-100	AFEDO	Kapolei, HI
1	Ayles Fernie	BS-100	AFEDO	Livingston, LA
2	Ayles Fernie	BS-100	AFEDO	South Portland, ME
12	Ayles Fernie	BS-100	AFEDO	Pedricktown, NJ
1	Ayles Fernie	BS-100	AFEDO	Neah Bay, WA
1	Ayles Fernie	BS-100	AFEDO	Catano, Puerto Rico
1	Ayles Fernie	BS-100	AFEDO	Dickinson, TX
1	Ayles Fernie	BS-100	AFEDO	St. Croix, USVI

Dispersant Inventory

QTY (Gal)	Type	Address	City/Base	State
25,000	Accell Clean DWD 2.0	735 Peters Rd.	Harvey	Louisiana
4,240	Finasol OSR 52	13103 Baypark Rd.	Pasadena	Texas
2,120	Finasol OSR 52	19000 Airdome Entry	Atwater	California
2,120	Finasol OSR 52	1605 Ferry Point Road	Alameda	California
4,240	Finasol OSR 52	4364 County Road 30	Robstown	Texas
4,240	Finasol OSR 52	1736 Bayview Avenue	Panama City	Florida
4,240	8 Totes Finasol OSR 52 8 Totes Accell Clean DWD 2.0	1081 Broadway.	Long Beach	California
4,240	Accell Clean DWD 2.0	Road 869, Street #2	Catano	Puerto Rico
4,240	Accell Clean DWD 2.0	C/O Sprague Terminal 59 Main Street	South Portland	Maine
4,240	Accell Clean DWD 2.0	30 Porcupine Road	Pedricktown	New Jersey
4,240	Accell Clean DWD 2.0	6211 North Ensign Street	Portland	Oregon
4,240	Accell Clean DWD 2.0	2001 W. Garfield Street	Seattle	Washington
4,240	Accell Clean DWD 2.0	14005 SW 127th St	Miami	Florida
27,560	Finasol OSR 52	300 Midway Street	Kapolei	Hawaii

Vessel Spray Systems



**NRC's AylesFerne BoatSpray 100
port side spray arm being tested with water at
Neah Bay, WA**



**NRC's AFEDO dispersant spray nozzles
attached to a vessel of opportunity**

VRP Update for Dispersant CAPS

Incorporated by reference

33 CFR 155.1050(k) - Dispersants

The Planholder has ensured through contract or other approved means, response resources capable of conducting dispersant operations within inland, nearshore and offshore areas that are pre-authorized for dispersant application. The Dispersant Resource Provider identified by this Planholder and meeting the requirements set forth under 33 CFR 155.1050(k) is listed below:

National Response Corp. (NARCO)

3500 Sunrise Highway

Great River, NY 11739

Main Phone:	+1 631 224 9141
Alt. Phone:	+1 800 899 4672
	(U.S. Based Calls Only)
Fax:	+1 631 224 9082
IOC Fax:	+1 631 224 9086
Telex:	49617380

All assets and resources necessary to meet the requirements under 33 CFR 155.1050(k) and provided by the above listed OSRO, are hereby incorporated by reference to the OSROs inventory of compliant resources as approved by the U.S. Coast Guard.



VRP Update for Aerial Tracking

33 CFR 155.1050(I) – Aerial Tracking

The Planholder has ensured through contract or other approved means, response resources necessary to provide aerial oil tracking to support oil spill assessment and cleanup activities. The Aerial Tracking Resource provider identified by this Planholder and meeting the requirements set forth under 33 CFR 155.1050(I) is listed below:

National Response Corp. (NARCO)
3500 Sunrise Highway
Great River, NY 11739

Main Phone: +1 631 224 9141

Alt. Phone: +1 800 899 4672

(U.S. Based Calls Only)

Fax: +1 631 224 9082

IOC Fax: +1 631 224 9086

Telex: 49617380

All assets and resources necessary to meet the requirements under 33 CFR 155.1050(I) and provided by the above listed provider, are hereby incorporated by reference to their inventory of compliant resources as approved by the U.S. Coast Guard. These capabilities, assets and resources include but are not limited to:

Meeting arrival time constraints for tiers 1, 2, and 3 Worst Case discharge response times;

- providing a list of appropriately located aircraft and personnel;
- providing sufficient numbers of aircraft with adequate support personnel;
- providing observation personnel which will be provided by either/both the listed Spill Management Team and/or the aerial tracking provider; and
- ensuring the ability to support aerial surveillance for a minimum of three 10-hour operational periods during the initial 72 hours of the discharge.

