



**Washington State
Department of Ecology**

Spill Prevention, Preparedness, and Response Program
PO Box 47600, Olympia, WA 98504-7600

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Primary Response Contractor (PRC) Application

INTRODUCTION

The information provided in this application will be used to verify and evaluate your Primary Response Contractor (PRC) application, and may be used to support oil spill contingency plan approvals submitted under Chapter 173-182 Washington Administrative Code (WAC) Oil Spill Contingency Plan Rule and Chapter 173-186 WAC Oil Spill Contingency Plan - Railroad Rule. PRC applications are subject to a 30 day public review and comment period prior to receiving approval from the state, in accordance with WAC 173-182-640. All information provided in the application is subject to public disclosure.

WAC 173-182-810

Equipment and personnel readiness will be verified once the application is approved. Ecology may inspect equipment, training records, maintenance records, drill records, may request a test of the call-out procedures, and require operation of each type of equipment listed in the application. These inspections may be conducted at any/all equipment locations. Any resources not on-site at the time of an inspection shall be accounted for by company records.

WAC 173-182-820

The PRC is responsible for providing written notification to Ecology and all plan holders to whom they are obligated, within twenty-four hours, of any significant change in the information reported in the approved application. The notice shall include the identification of back up resources sufficient to maintain the PRC readiness level, and the estimated date that the original equipment shall be back in full service.

WAC 173-182-900

Ecology may verify compliance with this chapter by examining training and equipment maintenance records, drill records, accuracy of call-out and notification lists, spill management team lists, ICS forms, waste disposal records, post-spill reviews and records on lessons learned.

Oil spill responses present opportunities to gather information on the effectiveness of your resources. Responses may also provide information that will support your PRC approval, especially requests for alternative recovery rates or alternative transit speeds for equipment.

Submit your completed and signed application via email to spills.prca@ecy.wa.gov or via mail to:

**Washington Department of Ecology
Spill Preparedness Section – Primary Response Contractor Application Review
PO Box 47600
Olympia, WA 98504-7600**

A – CONTACT INFORMATION

Company Name:

NRC Environmental Services Inc.

UBI Number:

601-421-393

Point of Contact:

Crescent Moegling

Mailing Address:

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cmoegling@republicservices.com

B – SIGNATURE

The information in this application is accurate and NRC Environmental Services Inc. is committed to:

1. Having a process to provide 24 hour per day contact for spill response. WAC 173-182-800
2. Beginning mobilization efforts immediately upon notification but no later than one hour from notification of a spill. WAC 173-182-800
3. Maintaining equipment in accordance with manufacturer specifications. WAC 173-182-800
4. Identifying and training staff and supervisors expected to be deployed on oil spill response tactics or used to meet the plan holder planning standards. WAC 173-182-800
5. Assisting plan holders in meeting the requirements for plans and drills in Washington. WAC 173-182-800
6. Maintaining a list of PRC response equipment on the Worldwide Response Resource List or provide an equivalent electronic equipment list and confirm the accuracy of the list on a quarterly basis. WAC 173-182-810
7. Providing written notification to Ecology and all plan holders to whom they are obligated, within twenty-four hours, of any significant change in the information reported in the approved application. WAC 173-182-820
8. Participating in drill and equipment verification programs. WAC 173-182-700

Crescent Moegling _____

Printed Name

Marine Program Manager _____

Title

March 16, 2026 _____

Signature (electronic signature is acceptable)

Date

Detail your company personnel and equipment response capabilities in the sections below. For all sections that do not apply indicate not applicable.

C – NOTIFICATION AND PERSONNEL RESOURCES: To be approved, applicants must have a process to provide 24 hour/day contact for spill response personnel and commit to begin mobilization efforts immediately but no longer than 1 hour from notification of a spill. WAC 173-182-800

C1. Describe your 24 hour response system and provide the 24 hour phone number. Cite the name of a central reporting office or individual(s) responsible for implementing your call-out process.

NRC can be contacted for spill response 24-hours a day, by calling either the local NRC office phone number or the NRC International Operations Center (IOC) at 800-899-4672 - where office after-hours calls are also routed. The NRC IOC is staffed 24-hours a day by NRC dispatchers trained to receive emergency spill response requests and assist NRC response clients. Duty Rosters for the on-call spill response supervisors and personnel for all NRC locations, as well as response contract client lists, are maintained both at the IOC and at the individual regional NRC offices.

C2. Describe the order of priority for call-out of your personnel. Include a sample duty roster if applicable.

Initial calls for spill response are answered by trained dispatchers in the regional offices during normal working hours and by the NRC IOC after hours. The dispatcher collects the caller's contact information and initial details of the spill and immediately contacts the appropriate on-call supervisor. The on-call supervisor contacts the client, receives approval for resource mobilization and any additional details or instructions for the response. The spill supervisor, supported as needed by dispatch, will mobilize equipment and personnel resources as agreed with the client.

See “NRC WA PRC Application 3-16-2026 Attachment C-2 - On-Call Roster”

C3. Include a list of response personnel and indicate whether they are full time or part-time employees and their home base or office location. It is not necessary to include personal information such as phone numbers. That information shall be maintained by the PRC and made available to Ecology upon request. You may add additional lines or use an alternate format and include this information as an attachment if additional space is needed. If personnel are available as sub-contracted or non-dedicated resources a summary of contract terms for personnel resources should be included in the application along with a statement that the contract will be made available to Ecology upon request.

See “NRC WA PRC Application 3-16-2026 Attachment C-3 - Response Personnel”

D – COMMUNICATION: Include details and capabilities of company owned communications assets. WAC 173-182-810

Describe your communications systems; include the frequencies used (i.e., VHF, UHF), and geographical ranges of each system. A completed ICS-205 form may be used to address this requirement. Include a list of all communications assets by type, brand, and staging location. In lieu of including the asset list in this application, you may state where the list is maintained, by whom, and commit to making it available to Ecology upon request.

NRC uses several communication systems to support operations. VHF FM radios, including handheld units and base stations, are kept in each office and on vessels, with additional radios available from Day Wireless. All VHF systems are licensed by the FCC, although individual operator permits are not required. Frequencies used for spill response vary by area and direction from the Incident Commander, with commonly used channels including 7, 9–11, 18–19, 63, 65, 67, 69, 72–73, 78–80, 88, and 89. NRC also uses UHF FM radios for industrial and onshore work, installed in offices, vacuum trucks, and spill response vehicles; these systems are also FCC licensed without operator permit requirements. In addition to radio systems, NRC personnel use company issued smartphones for communication.

E - TRAINING INFORMATION: To be approved applicants must identify and train staff and supervisors expected to be deployed on oil spill response tactics or used to meet plan holder planning standards. WAC 173-182-800 & WAC 173-182-810

Include a list of the type and frequency of training staff receive as applicable for the response roles they may fill. Include details about training sub-contractors if applicable. The list may be organized by position or may be an inventory of staff training levels.

The following categories of training, at a minimum, should be described as applicable for each response role:

1. HAZWOPER training.
2. Safety and site safety assessment.
3. Assessment of environmental conditions.
4. Operation of response equipment.
5. Determination that equipment is appropriate for the operating environment and incident conditions.
6. Use of air monitoring equipment.
7. Developing a hazard worksheet.
8. Selection of personal protective equipment appropriate to the incident conditions.
9. Use and deployment of limited visibility tracking devices.
10. Incident Command System (ICS) and training on key spill management team roles.
11. Familiarity with the Geographic Response Plans (GRPs) and deployment of strategies, anchoring and setting boom.
12. Familiarity with the Northwest Area Contingency Plan (NWACP).
13. Land spill response strategies.
14. Fast water river response strategies.
15. On water recovery including enhanced skimming.
16. Dispersant use and deployment.
17. Marine and inland in-situ burning operations.
18. Aerial observer activities to support operations and planning.
19. Use and coordination of communications equipment.
20. Familiarization and deployment of PRC owned oiled-wildlife rehabilitation equipment.
21. Directing field resources.
22. Shoreline cleanup tactics.

See “NRC WA PRC Application 3-16-2026 Attachment C-3 - Response Personnel”

E1. SPILL MANAGEMENT TEAM SUPPORT: PRCs may be approved to support plan holders in meeting limited spill management team roles as detailed in this application. PRCs must identify the the roles that they train staff to fill and describe the training program. If a plan holder relies on a PRC to staff ICS positions for the spill management team, then the commitment must be specified in writing. WAC 173-182-230(3)(iv).

Include a list of the type and frequency of training staff receive as applicable by ICS position. The training must be position specific for the roles that may be filled. A combination of training and experience in drills and spills may be used to describe personnel capability within response roles. The list may be organized by position or may be an inventory of staff training levels.

The following categories of training, at a minimum, should be described as applicable to the role:

1. ICS training.
2. NWACP policies and response tools.
3. Use and location of GRPs.
4. Contents of the contingency plan(s).
5. Worker health and safety requirements including Washington state specific regulations.

Additionally describe the estimated mobilization time for personnel resources to be able to arrive in state.

See “NRC WA PRC Application 3-16-2026 Attachment C-3 - Response Personnel”
& “NRC WA PRC Application 3-16-2026 Attachment E-1 - Spill Management Team Support”

F – RESPONSE EQUIPMENT: To become a state approved PRC, applicants must list response equipment on the Worldwide Response Resource List (WRRL) currently located at www.wrri.world, or provide an equivalent

electronic equipment list and commit to maintaining the equipment list in whatever format is provided. WAC 173-182-800.

To join the WRRL and for additional information about listing equipment visit <https://ecology.wa.gov/Regulations-Permits/Plans-policies/Contingency-planning-for-oil-industry/Worldwide-Response-Resource-List>.

F1. DEDICATED RESPONSE EQUIPMENT: For all equipment owned and dedicated to oil spill response provide an electronic equipment list with the following information.

Boom: List the location, total lengths of boom (feet), manufacturer's name, model, and size.

Oil Recovery: State the location, manufacturer's name and model, minimum crew requirements for a 12 hour shift, and derated nameplate capacity (EDRC) for each type of oil recovery device. List associated equipment such as pumps and generators.

Storage: State the types of temporary storage devices by location, manufacturer's name and model, minimum crew requirements for a 12 hour shift, and maximum capacity in barrels. (e.g. barges, vac-trucks, portable tanks)

Vessels/workboats: provide the location, vessel name or identifier, minimum crew requirements for a 12 hour shift, length, vessel type by design; amount of boom on board plus other assets that would be applicable to oil spill response (e.g., crane, outriggers, skimmer, storage, etc.).

Vehicles: List vehicles that would be used to transport equipment or people.

PRCs are urged to maintain the dedicated equipment list on the Worldwide Response Resource List (WRRL), www.wrri.world, in lieu of submitting a list with the PRC application.

See "NRC WA PRC Application 3-16-2026 WRRL"

F2. NON-DEDICATED WORKBOATS: Provide a detailed description of access to non-dedicated workboats and barges. These are vessels which may be available to support responses on an as-available basis but are not dedicated oil spill response assets. The description should include the vessel owners, number of vessels, availability throughout the year, vessel types and size, a description of any training vessel operator and crew receive, and the tactics the non-dedicated workboats may support.

NRC has identified a variety of non-dedicated equipment resources, including support vessels, that could be available for spill response operations. These non-dedicated vessels can be utilized as platforms for Vessel of Opportunity (VOO) skimming systems, boom deployment, personnel transportation and other support activities. The crews of non-dedicated vessels provide vessel operations and are not involved directly in recovery operations.

See "NRC WA PRC Application 3-16-2026 VOO"

F3. VESSELS OF OPPORTUNITY (VOO): If you maintain a VOO program in accordance with WAC 173-182-317 on behalf of a vessel contingency plan holder include the following detailed information about the contracted VOO:

1. Verify that the vessels of opportunity contracted under your program are listed under the organization VOO in the WRRL online database and ensure the vessel information in the equipment list is renewed annually.
2. List the regional area(s) for which you contract VOO.
3. List the vessels you contract for each regional area your plan holders transit or operate. Provide vessel name, vessel type, vessel home base, and the tactics VOO could be used to support.
4. Describe your training plan for each VOO specific to the tactics the VOO may support.
5. Describe how VOO would be called out in an emergency response and where the call out list is maintained.
6. Provide the location of where the current contracts are kept and maintained and include a statement in the application that the contracts will be made available for Ecology review upon request.
7. Washington State maintains a database of vessel owners interested in supporting responses a vessels of opportunity. This database is intended to support plan holders and PRCs in identifying potential VOO vessels. Access the database at www.oilspills101.wa.gov.

See "NRC WA PRC Application 3-16-2026 VOO"

F4. ALTERNATIVE RESPONSE TECHNOLOGY: Describe response technology systems available such as bioremediants, surface washing agents, herders and other miscellaneous oil spill control agents. List the types and

locations of available equipment and include an operations plan describing how the technology will be mobilized, deployed, and monitored.

See "NRC WA PRC Application 3-16-2026 Attachment F-4 - Alternative Response Technology"

F5. DISPERSANTS: List the types and locations of available equipment and include an operations plan describing how the technology will be mobilized, deployed, and monitored. Include the following specific details in describing your operational capability to deploy dispersants:

1. Dispersant type/brand/trade name.
2. Location(s) and volume of dispersant.
3. Describe operational support capability, including the platforms and spotters used to deploy dispersants.
4. Describe your ability to monitor the operational efficacy of the dispersant application to support operational decision-making, and ensure safety of response personnel.
5. Describe how the design and operation of the dispersant application system can reasonably be expected to apply the chemical dispersant in a manner consistent with the dispersant manufacturer's recommendations, especially with regard to dosage rates and concentrations.
6. Describe the aerial dispersant load capability in gallons for any aerial dispersant application system you may use.
7. Describe the vessel dispersant load capability in gallons for any vessel dispersant application system you may use.

NRC has dedicated aircraft and resident dispersant supplies as listed in the WRRL to provide dispersant response capabilities.

See "NRC WA PRC Application 3-16-2026 Attachment F-5 - Dispersants Program"

F6. IN-SITU BURNING: List the types and locations of equipment available and include an operations plan. Describe how the technology will be mobilized, deployed, and monitored. Include the following specific details in describing your operational capability to conduct in-situ burning.

1. Staging location and length of fire boom, conventional boom, tow bridles, and work boats capable of towing the boom for on-water burning operations.
2. Staging locations of air monitoring equipment and personal protective equipment.
3. Location of igniters and aircraft or vessels or other appropriate means to deploy the igniters.
4. Describe the aircraft, vessels, and personnel resources that will be used to monitor the operational effectiveness of in-situ burning.
5. For inland based burns, include a description of resources that could be used to control the burn. These resources may be dedicated, or non-dedicated.
6. Detail an operational plan for marine and/or inland burning operations.

NRC maintains 500 feet of reusable "Hydro-Fire" boom and manual igniter at Pier 90 representing an alternate response capability in excess of 1000 feet of containment for in-situ burns.

See "NRC WA PRC Application 3-16-2026 Attachment F-6 - In-Situ Burn Resources and Response"

F7. RESPONSE EQUIPMENT FOR NON-FLOATING OILS:

List vendors, equipment types, equipment home base, and access to equipment capable of responding to non-floating oils that is either:

1. An asset owned by the PRC.
2. Available to the PRC via letter of intent.
3. Available to the PRC via mutual aid agreement.
4. Available to the PRC under subcontract.
5. An asset available under other approvable means.

Examples of equipment and personnel that may support response to a non-floating oil spill include:

1. Equipment to detect and delineate the spilled oil such as side scan or multibeam sonar, laser fluorosensors, induced polarization, divers, or remotely operated vehicles or other methods to locate sunken or submerged oil.
2. Equipment to contain such as containment boom, sorbent boom, silt curtains, or tidal fences or other methods to contain the oil.

3. Equipment to recover such as dredges, submersible pumps, sorbents, or agitators.
4. Equipment to assess impacts such as sampling equipment.

See "NRC WA PRC Application 3-16-2026 Attachment F-7 - Group V Oils"

F8. WILDLIFE RESCUE AND REHABILITATION: Describe, in detail, any wildlife response equipment or personnel, owned or under contract, or other approvable means. List the types and locations of equipment used for wildlife response, such as; equipment to support reconnaissance, deterrence, capture, stabilization, rehabilitation and recovery Include any contracts or agreements for trained wildlife rehabilitation and rescue personnel. Include a diagram of how the equipment could be configured.

NRC meets the whale reconnaissance and deterrence requirements in WAC 173-182-540 through its contractor Focus Wildlife, which provides the specialized equipment, trained personnel, and operational capability needed to protect whales during spill response. Focus Wildlife, or a qualified subcontractor when needed, supplies aerial, vessel, and land-based resources for wildlife assessment and whale reconnaissance, including aircraft, observers, field teams, and trained crews with deterrent equipment capable of arriving within twelve hours. This structure ensures NRC can perform the monitoring, deterrence, and reconnaissance actions required to keep whales away from spilled oil in full alignment with Washington's wildlife response standards.

See "NRC WA PRC Application 3-16-2026 Attachment F-8 Wildlife Rescue & Rehabilitation"

F9: SHORELINE CLEANUP:

Shoreline cleanup personnel: Describe the plan for mobilization of shoreline cleanup personnel and supervisors. Include a process for cascading additional personnel, the name and phone number of the resource center where the staff will be obtained and estimated time to mobilize. If your PRC relies on another company for shoreline cleanup personnel, include the number of personnel available and the call-out process as well as the relationship to the company under contract or other approvable means.

Equipment: Identify the staging location(s) of passive recovery equipment for shoreline cleanup. List the staging location of your shoreline cleanup trailer and inventory of contents (PPE, hand tools, and other logistical support). List any additional logistical information for obtaining shoreline cleanup assets. For these assets list vendors, contact information, and shoreline cleanup resource types.

See "NRC WA PRC Application 3-16-2026 Attachment F-9 - Shoreline Cleanup"

F10: CONSUMABLES: Describe the consumable response equipment and amounts such as sorbent booms, sweeps, pads, and snares that are maintained at any one time. Include all staging locations of consumable equipment in your plan.

See "NRC WA PRC Application 3-16-2026 Attachment F-10 - Consumables"

F11: FIXED STORAGE: Describe your agreements for access to fixed shoreside storage (i.e., fixed facility tanks). Include the owner, location, and estimate of storage volume available.

See "NRC WA PRC Application 3-16-2026 Attachment F-11 Fixed Storage"

F12: AERIAL SURVEILLANCE ASSETS:

For each aerial surveillance provider you may use, list:

1. Name of provider.
2. Relationship to the provider (for example whether the provider is available under contract, letter of intent, or as a private asset available for call out).
3. The number, type, cruising speed, and staging location(s) of aerial assets available from the provider.

For each aerial surveillance provider listed:

1. Describe whether the provider has pilots and crew trained for aerial oil observation or if the PRC personnel will be used as the aerial observer on the aircraft.

2. If the PRC personnel will be used, list the names of your trained aerial observers, their home base, and training levels. At a minimum, personnel must be trained in aerial observation at the level set forth in federal regulations currently located at 33 C.F.R. 155.1050 (l)(2)(iii).
3. Describe the aerial observation tools that may be used by the aerial observer on the aircraft to acquire, interpret, record, and communicate oil location and other information to the command post or field operations such as;
 - The type of camera or video camera that will be utilized to photo document the overflight.
 - Cell phones, radios, or satellite phones that may be used.
 - Source for base maps that may be used to document the operational picture, location of the oil, extent of oiling, and environmental impacts.
 - Resource for position information such as latitude, longitude, azimuth, and bearing that the picture or base map was created.
 - Identify or include the aerial observation form that will be used to document the collected information.

Include additional information about best achievable technology remote sensing resources owned or contracted under WAC 173-182-321(3)(a,b,c).

See "NRC WA PRC Application 3-16-2026 Attachment F-12 - Aerial Surveillance"

F13. ADDITIONAL PRC OWNED RESOURCES: List any additional resources owned and available to support responses which were not previously detailed above, such as:

1. Land-based remote sensing or surveillance resources to detect and track the extent and movement of oil.
2. Marine-based remote sensing or surveillance resources to detect and track the extent and movement of oil.
3. Oiled debris handling resources such as earth removal equipment, dump trucks, etc.
4. Trajectory modeling resources.
5. Other as appropriate.

See "NRC WA PRC Application 3-16-2026 Attachment F-2 Letters of Intent"

F14. ADDITIONAL NON-DEDICATED RESOURCES: Describe any additional assets (i.e., personnel or equipment) not previously listed that may be available under mutual aid agreement, letter of intent, or other approvable means to support responses on an as-available basis but are not dedicated oil spill response assets.

See "NRC WA PRC Application 3-16-2026 Attachment F-2 Letters of Intent"

G – MAINTENANCE: To be approved the applicant must maintain equipment in accordance with manufacturer specifications. WAC 173-182-800

The inspections and maintenance shall be documented and the records maintained for five years. The location of the records shall be noted in the application, and all records shall be available for review during verification inspections conducted by Ecology. WAC 173-182-270

Describe your oil spill response equipment inspection and maintenance program. The equipment maintenance program at a minimum shall include the schedules, methods, and procedures for maintaining the equipment in a state of constant readiness for deployment. Include the key personnel responsible for ensuring resources are maintained and that have the ability to commit funds for repair or replacement.

See "NRC WA PRC Application 3-16-2026 Attachment G - Maintenance Manual"