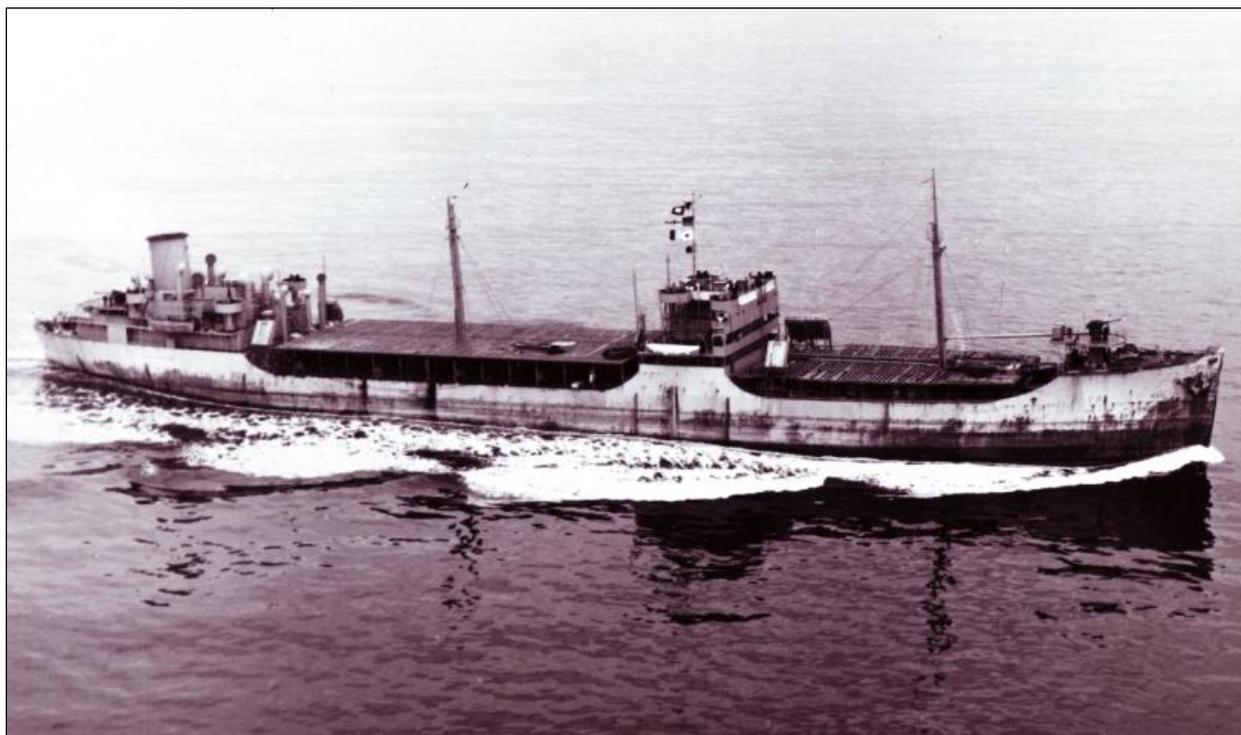




# Screening Level Risk Assessment Package

## *Bunker Hill*



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Photo: Photograph of *Bunker Hill*  
Source: [http://dcsfilms.com/Site\\_4/SS\\_Bunker\\_Hill.html](http://dcsfilms.com/Site_4/SS_Bunker_Hill.html)



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## Project Background

The past century of commerce and warfare has left a legacy of thousands of sunken vessels along the U.S. coast. Many of these wrecks pose environmental threats because of the hazardous nature of their cargoes, presence of munitions, or bunker fuel oils left onboard. As these wrecks corrode and decay, they may release oil or hazardous materials. Although a few vessels, such as USS *Arizona* in Hawaii, are well-publicized environmental threats, most wrecks, unless they pose an immediate pollution threat or impede navigation, are left alone and are largely forgotten until they begin to leak.

In order to narrow down the potential sites for inclusion into regional and area contingency plans, in 2010, Congress appropriated \$1 million to identify the most ecologically and economically significant potentially polluting wrecks in U.S. waters. This project supports the U.S. Coast Guard and the Regional Response Teams as well as NOAA in prioritizing threats to coastal resources while at the same time assessing the historical and cultural significance of these nonrenewable cultural resources.

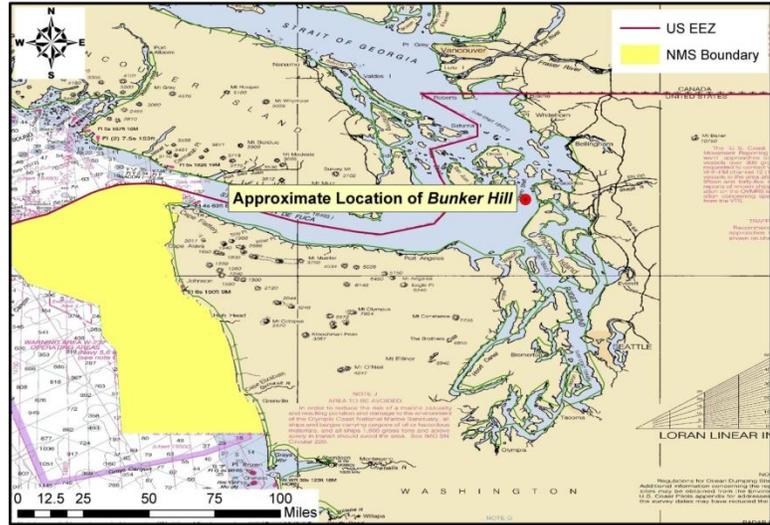
The potential polluting shipwrecks were identified through searching a broad variety of historical sources. NOAA then worked with Research Planning, Inc., RPS ASA, and Environmental Research Consulting to conduct the modeling forecasts, and the ecological and environmental resources at risk assessments.

Initial evaluations of shipwrecks located within American waters found that approximately 600-1,000 wrecks could pose a substantial pollution threat based on their age, type and size. This includes vessels sunk after 1891 (when vessels began being converted to use oil as fuel), vessels built of steel or other durable material (wooden vessels have likely deteriorated), cargo vessels over 1,000 gross tons (smaller vessels would have limited cargo or bunker capacity), and any tank vessel.

Additional ongoing research has revealed that 87 wrecks pose a potential pollution threat due to the violent nature in which some ships sank and the structural reduction and demolition of those that were navigational hazards. To further screen and prioritize these vessels, risk factors and scores have been applied to elements such as the amount of oil that could be on board and the potential ecological or environmental impact.

# Executive Summary: *Bunker Hill*

The tanker *Bunker Hill*, which exploded, broke in two, and sank while in ballast in Puget Sound in 1964, was identified as a potential pollution threat, thus a screening-level risk assessment was conducted. The different sections of this document summarize what is known about the *Bunker Hill*, the results of environmental impact modeling composed of different release scenarios, the ecological and socio-economic resources that would be at risk in the event of releases, the screening-level risk scoring results and overall risk assessment, and recommendations for assessment, monitoring, or remediation.



Based on this screening-level assessment, each vessel was assigned a summary score calculated using the seven risk criteria described in this report. For the Worst Case Discharge, *Bunker Hill* scores Low with 11 points; for the Most Probable Discharge (10% of the Worst Case volume), *Bunker Hill* also scores Low with 9 points. Given these scores, NOAA recommends that this site be noted in the Area Contingency Plans so that if a mystery spill is reported in the general area, this vessel could be investigated as a source. Should additional information become available that would suggest a greater level of concern, then an active monitoring program could be implemented or an assessment undertaken. Outreach efforts with the technical and recreational dive community as well as commercial and recreational fishermen who frequent the area would be helpful to gain awareness of any significant changes or further deterioration of the site.

Vessel Risk Factors		Risk Score	
Pollution Potential Factors	A1: Oil Volume (total bbl)	Med	
	A2: Oil Type		
	B: Wreck Clearance		
	C1: Burning of the Ship		
	C2: Oil on Water		
	D1: Nature of Casualty		
D2: Structural Breakup			
Archaeological Assessment	Archaeological Assessment	Not Scored	
Operational Factors	Wreck Orientation	Not Scored	
	Depth		
	Confirmation of Site Condition		
	Other Hazardous Materials		
	Munitions Onboard		
	Gravesite (Civilian/Military)		
Historical Protection Eligibility			
		WCD	MP (10%)
Ecological Resources	3A: Water Column Resources	Low	Low
	3B: Water Surface Resources	Med	Low
	3C: Shore Resources	Low	Low
Socio-Economic Resources	4A: Water Column Resources	Low	Low
	4B: Water Surface Resources	Med	Low
	4C: Shore Resources	Med	Med
Summary Risk Scores		11	9

The determination of each risk factor is explained in the document. This summary table is found on page 39.

## SECTION 1: VESSEL BACKGROUND INFORMATION: REMEDIATION OF UNDERWATER LEGACY ENVIRONMENTAL THREATS (RULET)

### Vessel Particulars

**Official Name:** *Bunker Hill*

**Official Number:** 241580

**Vessel Type:** Tanker

**Vessel Class:** T2-SE-A1 Type Tanker

**Former Names:** N/A

**Year Built:** 1942

**Builder:** Sun Shipbuilding & Dry Dock Company (Sun Ship), Chester, PA

**Builder's Hull Number:** 242 (MARAD Hull #317)

**Flag:** American

**Owner at Loss:** Keystone Tankship Corporation, DE

**Controlled by:** Unknown

**Chartered to:** Unknown

**Operated by:** Keystone Shipping Company, Philadelphia, PA

**Homeport:** Wilmington, DE

**Length:** 504 feet

**Beam:** 68.2 feet

**Depth:** 39.2 feet

**Gross Tonnage:** 10,590 (16,600 DWT class)

**Net Tonnage:** 6,417

**Hull Material:** Steel

**Hull Fastenings:** Welded

**Powered by:** Oil-fired steam

**Bunker Type:** Heavy fuel oil (Bunker C)

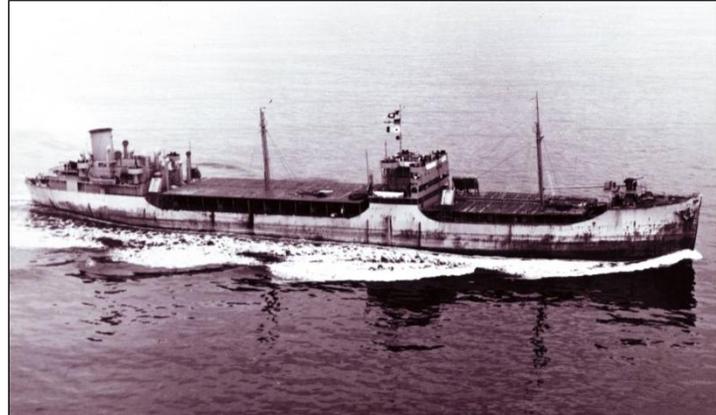
**Bunker Capacity (bbl):** ≈ 11,026

**Average Bunker Consumption (bbl) per 24 hours:** ≈ 295

**Liquid Cargo Capacity (bbl):** 141,158

**Dry Cargo Capacity:** 560 tons

**Tank or Hold Description:** Vessel had 9 cargo tanks, tanks Nos. 2 to 9 being divided by two longitudinal bulkheads so that there were 2 wing tanks, port and starboard, and a center tank; tank No. 1 was divided by a center line bulkhead into 2 tanks. The vessel also had 1 forward deep tank split starboard & port



## Casualty Information

**Port Departed:** Tacoma, WA

**Destination Port:** Anacortes, WA

**Date Departed:** March 5, 1964

**Date Lost:** March 6, 1964

**Number of Days Sailing:** 1

**Cause of Sinking:** Explosion and fire

**Latitude (DD):** 48.41763

**Longitude (DD):** -122.7423

**Nautical Miles to Shore:** 3

**Nautical Miles to NMS:** 107

**Nautical Miles to MPA:** 0

**Nautical Miles to Fisheries:** Unknown

**Approximate Water Depth (Ft):** 280

**Bottom Type:** Unknown

**Is There a Wreck at This Location?** Yes, the wreck has been positively located and identified

**Wreck Orientation:** Broken in two pieces and resting on one side

**Vessel Armament:** None

**Cargo Carried when Lost:** None, sailing in ballast

**Cargo Oil Carried (bbl):** 0

**Cargo Oil Type:** N/A

**Probable Fuel Oil Remaining (bbl):** Unknown,  $\leq 1,713$

**Fuel Type:** Heavy fuel oil (Bunker C)

**Total Oil Carried (bbl):**  $\leq 1,713$

**Dangerous Cargo or Munitions:** None

**Munitions Carried:** None

**Demolished after Sinking:** No

**Salvaged:** No

**Cargo Lost:** N/A

**Reportedly Leaking:** No

**Historically Significant:** Unknown, potentially

**Gravesite:** Yes

**Salvage Owner:** Not known if any

## Wreck Location

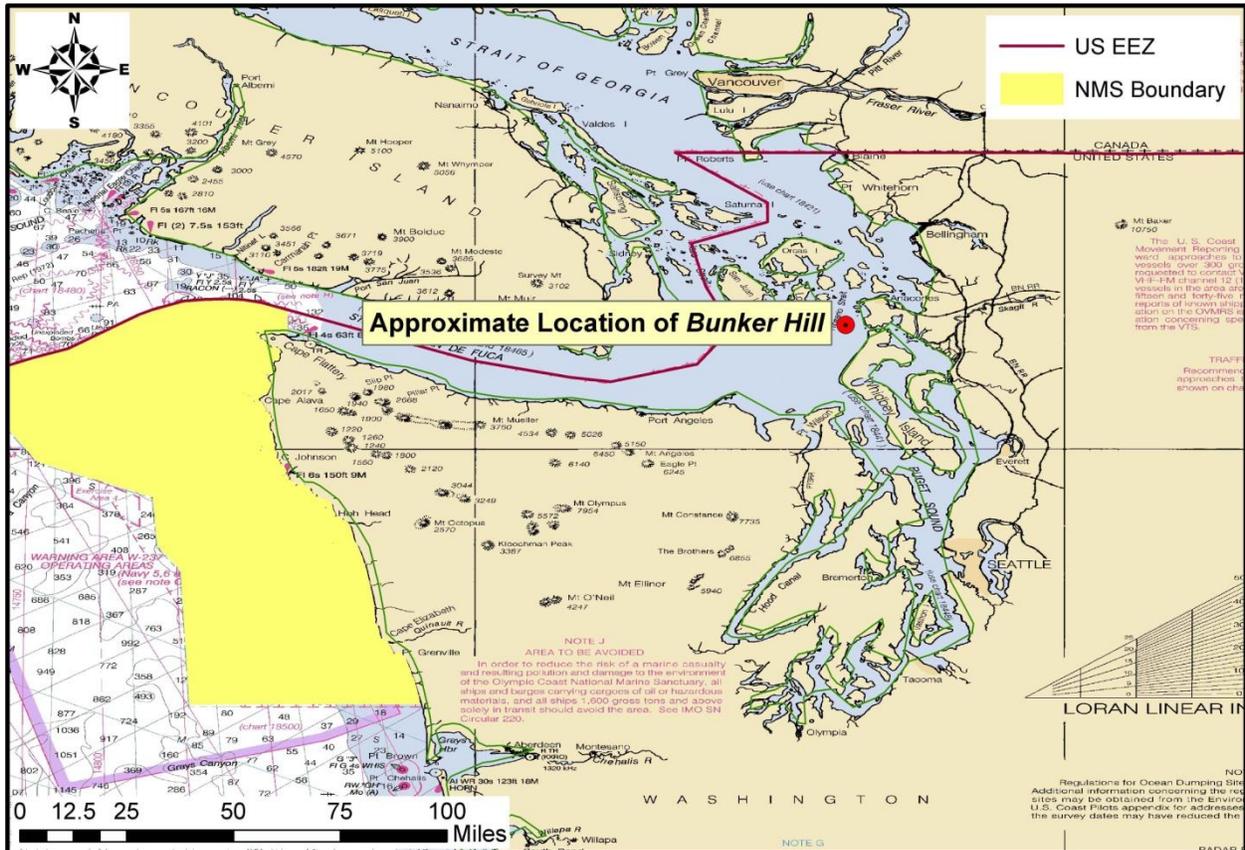


Chart Number: 18007

## Casualty Narrative

“At approximately 0402 (PST) on 6 March 1964 while the SS *BUNKER HILL* was en route from Tacoma, Washington, to Anacortes, Washington, and in approximate position 48 degrees 23 minutes North, 122 degrees 45 minutes West, an explosion occurred in the No. 9 cargo tanks causing the vessel to break in two. In less than an hour, the vessel had sunk. Of the 31 persons on board, the master and four crewmembers who were in the midship house are missing and presumed to have been lost.”

<http://www.uscg.mil/hq/cg5/docs/boards/bunkerhill.pdf>

## General Notes

NOAA Automated Wreck and Obstruction Information System (AWOIS) Data:  
AWOIS ITEM 50435

### SURVEY REQUIREMENTS COMMENT

100% COVERAGE BY A SHALLOW WATER MULTI-BEAM SOUNDING SYSTEM IS ACCEPTABLE FOR RESOLVING THIS ITEM.

### HISTORY

CL320/64--USCG AND USC&GS; CHART LETTER CONTAINS THE CG MESSAGES OF THE INCIDENT OF THE TANKER *BUNKER HILL* EXPLODING, BURNING, SINKING, AND THEIR

SEARCH & RESCUE EFFORTS. ALSO INCLUDED IS THE FINDING OF THE USC&GS VESSELS HODGSON AND BOWIE WHICH FOUND THE TWO PARTS OF THE TANKER IN LAT. 48/25/40N, LONG. 122/44/35W (NAD27) AND LAT. 48/25/04N, LONG 122/44/28W (NAD27). BOTH SECTIONS WERE FOUND TO BE COVERED BY 28 FATHOMS AT MLLW. (ENTERED 4/97 BY MBH)

S-N905-DA-81, PROJECT INSTRUCTIONS, BS3 CHARACTERIZATION TESTS--ASSIGNED AS TEST AREA C; SCALED POSITION 48-25-40.2N, 122-44-35.4W NOAA TECHNICAL REPORT OTES-9, PERFORMANCE CHARACTERISTICS OF THE BS3--NORTH WRECK, PROBABLY STERN SECTION, OBSERVED W/214 FT LD BY BS3. POS. NOT REPORTED. H10939/99-00--OPR-N368-PHP; THE NORTHERN PORTION OF THE WRECK WAS FOUND BY SIDE SCAN SONAR AND DEVELOPED FOR POSITION AND LEAST DEPTH BY ECHOSOUNDER. THE LEAST DEPTH OBTAINED IS 35.3 FATHOMS MLLW IN LAT. 48/25/39.67N, LONG 122/44/40.60W (NAD83). (UPDATED 7/03 BY MBH)

"In sworn statements taken after the sinking, a dock worker and local agent for the owners of the *Bunker Hill* said that the ship had been completely emptied of cargo (gasoline, diesel oil, stove oil, and industrial fuel) on 5 March 1964. Left onboard for the trip to Anacortes was 1,713 bbl (i.e., 71,946 gallons) of bunker fuel. NOAA reports that the *Bunker Hill* sank after 'being ripped apart by an explosion in an empty cargo tank.' According to the log of the Pacific Tow Boat Company, a spill response and cleanup operation occurred after the sinking from 6-11 March 1964. While no record indicates the amount of fuel recovered, the log includes a statement from 10 March 1964 that "no signs of oil" were coming from the vessel."

[-http://www.scret.org/index.php?option=com\\_content&task=view&id=14](http://www.scret.org/index.php?option=com_content&task=view&id=14)

## Wreck Condition/Salvage History

"In 1982, NOAA's Ocean Technology and Engineering Services division conducted tests of a bathymetric swath survey system on the *Bunker Hill*. This report determined that the bow section was located south of the stem section. The bow section is lying on its side and includes the midship superstructure which houses the bridge. This section is approximately 300 feet long and 50-75 feet wide. The stem section (northern piece) appeared to have been a square piece of wreckage 100 by 100 feet. Although the stem section described in the NOAA report is significantly smaller than the stern of the Ship, the fuel oil tank was originally located at the stern of the vessel."

[-http://www.scret.org/index.php?option=com\\_content&task=view&id=14](http://www.scret.org/index.php?option=com_content&task=view&id=14)

-Low visibility diver video footage of the wreck can be found at [http://www.dcsfilms.com/Site\\_4/Bunker\\_Hill\\_shipwreck.html](http://www.dcsfilms.com/Site_4/Bunker_Hill_shipwreck.html)

## Archaeological Assessment

The archaeological assessment provides additional primary source based documentation about the sinking of vessels. It also provides condition-based archaeological assessment of the wrecks when possible. It does not provide a risk-based score or definitively assess the pollution risk or lack thereof from these vessels, but includes additional information that could not be condensed into database form.

Where the current condition of a shipwreck is not known, data from other archaeological studies of similar types of shipwrecks provide the means for brief explanations of what the shipwreck might look like and specifically, whether it is thought there is sufficient structural integrity to retain oil. This is more

subjective than the Pollution Potential Tree and computer-generated resource at risk models, and as such provides an additional viewpoint to examine risk assessments and assess the threat posed by these shipwrecks. It also addresses questions of historical significance and the relevant historic preservation laws and regulations that will govern on-site assessments.

In some cases where little additional historic information has been uncovered about the loss of a vessel, archaeological assessments cannot be made with any degree of certainty and were not prepared. For vessels with full archaeological assessments, NOAA archaeologists and contracted archivists have taken photographs of primary source documents from the National Archives that can be made available for future research or on-site activities.

## Assessment

There is no archaeological assessment available for *Bunker Hill*. Records relating to the loss of the vessel were not part of the National Archives record groups examined by NOAA archaeologists. It is likely that the local U.S. Coast Guard District or Sector may have access to more records about this wreck than are available at the National Archives. This means that the best assessment on the sinking of the ship probably still comes from the U.S. Coast Guard's Marine Board of Investigation Report written about this vessel.

This vessel may be historic significance and will require appropriate actions be taken under the National Historic Preservation Act (NHPA) prior to any actions that could impact the integrity of the vessel. The site may be eligible for listing in the National Register of Historic Places and is considered a gravesite and appropriate actions should be undertaken to minimize disturbance to the site.

## Background Information References

Vessel Image Sources: [http://dcsfilms.com/Site\\_4/SS\\_Bunker\\_Hill.html](http://dcsfilms.com/Site_4/SS_Bunker_Hill.html)

Construction Diagrams or Plans in RULET Database? Yes, for vessel type

### Text References:

-<http://www.uscg.mil/hq/cg5/docs/boards/bunkerhill.pdf>

-[http://www.scret.org/index.php?option=com\\_content&task=view&id=14](http://www.scret.org/index.php?option=com_content&task=view&id=14)

-<http://www.newspaperarchive.com/SiteMap/FreePdfPreview.aspx?img=105375460>

-<http://www.newspaperarchive.com/SiteMap/FreePdfPreview.aspx?img=114936120>

-AWOIS database #50436

-[http://www.dcsfilms.com/Site\\_4/SS\\_Bunker\\_Hill.html](http://www.dcsfilms.com/Site_4/SS_Bunker_Hill.html)

## Vessel Risk Factors

In this section, the risk factors that are associated with the vessel are defined and then applied to the *Bunker Hill* based on the information available. These factors are reflected in the pollution potential risk assessment development by the U.S. Coast Guard Salvage Engineering Response Team (SERT) as a means to apply a salvage engineer’s perspective to the historical information gathered by NOAA. This analysis reflected in Figure 1-1 is simple and straightforward and, in combination with the accompanying archaeological assessment, provides a picture of the wreck that is as complete as possible based on current knowledge and best professional judgment. This assessment *does not* take into consideration operational constraints such as depth or unknown location, but rather attempts to provide a replicable and objective screening of the historical date for each vessel. SERT reviewed the general historical information available for the database as a whole and provided a stepwise analysis for an initial indication of Low/Medium/High values for each vessel.

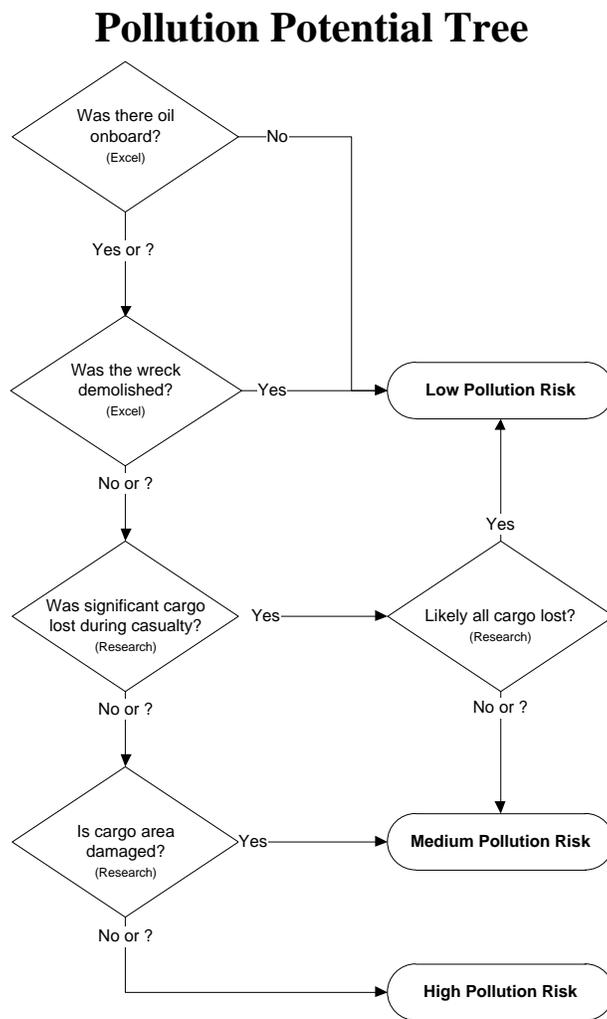


Figure 1-1: U.S. Coast Guard Salvage Engineering Response Team (SERT) developed the above Pollution Potential Decision Tree.

In some instances, nuances from the archaeological assessment may provide additional input that will amend the score for Section 1. Where available, additional information that may have bearing on operational considerations for any assessment or remediation activities is provided.

### **Pollution Potential Factors**

#### **Risk Factor A1: Total Oil Volume**

The oil volume classifications correspond to the U.S. Coast Guard spill classifications:

- **Low Volume: Minor Spill** <240 bbl (10,000 gallons)
- **Medium Volume: Medium Spill** ≥240 – 2,400 bbl (100,000 gallons)
- **High Volume: Major Spill** ≥2,400 bbl (≥100,000 gallons)

The oil volume risk classifications refer to the volume of the most-likely Worst Case Discharge from the vessel and are based on the amount of oil believed or confirmed to be on the vessel.

The *Bunker Hill* is ranked as Medium Volume because it is thought to have a potential for up to 1,713 bbl, although some of that was lost at the time of the casualty due to the explosion and breakup of the vessel. Data quality is high.

The risk factor for volume also incorporates any reports or anecdotal evidence of actual leakage from the vessel or reports from divers of oil in the overheads, as opposed to potential leakage. This reflects the history of the vessel's leakage. There are no reports of leakage from the *Bloody Marsh*.

#### **Risk Factor A2: Oil Type**

The oil type(s) on board the wreck are classified only with regard to persistence, using the U.S. Coast oil grouping<sup>1</sup>. (Toxicity is dealt with in the impact risk for the Resources at Risk classifications.) The three oil classifications are:

- **Low Risk: Group I Oils** – non-persistent oil (e.g., gasoline)
- **Medium Risk: Group II – III Oils** – medium persistent oil (e.g., diesel, No. 2 fuel, light crude, medium crude)
- **High Risk: Group IV** – high persistent oil (e.g., heavy crude oil, No. 6 fuel oil, Bunker C)

The *Bunker Hill* is classified as High Risk because the bunker oil is heavy fuel oil, a Group IV oil type. Data quality is high.

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<sup>1</sup> Group I Oil or Nonpersistent oil is defined as "a petroleum-based oil that, at the time of shipment, consists of hydrocarbon fractions: At least 50% of which, by volume, distill at a temperature of 340°C (645°F); and at least 95% of which, by volume, distill at a temperature of 370°C (700°F)."

Group II - Specific gravity less than 0.85 crude [API° >35.0]

Group III - Specific gravity between 0.85 and less than .95 [API° ≤35.0 and >17.5]

Group IV - Specific gravity between 0.95 to and including 1.0 [API° ≤17.5 and >10.0]

### ***Was the wreck demolished?***

#### **Risk Factor B: Wreck Clearance**

This risk factor addresses whether or not the vessel was historically reported to have been demolished as a hazard to navigation or by other means such as depth charges or aerial bombs. This risk factor is based on historic records and does not take into account what a wreck site currently looks like. The risk categories are defined as:

- **Low Risk:** The wreck was reported to have been entirely destroyed after the casualty
- **Medium Risk:** The wreck was reported to have been partially cleared or demolished after the casualty
- **High Risk:** The wreck was not reported to have been cleared or demolished after the casualty
- **Unknown:** It is not known whether or not the wreck was cleared or demolished at the time of or after the casualty

The *Bunker Hill* is classified as High Risk because there are no known historic accounts of the wreck being demolished as a hazard to navigation. Data quality is high.

### ***Was significant cargo or bunker lost during casualty?***

#### **Risk Factor C1: Burning of the Ship**

This risk factor addresses any burning that is known to have occurred at the time of the vessel casualty and may have resulted in oil products being consumed or breaks in the hull or tanks that would have increased the potential for oil to escape from the shipwreck. The risk categories are:

- **Low Risk:** Burned for multiple days
- **Medium Risk:** Burned for several hours
- **High Risk:** No burning reported at the time of the vessel casualty
- **Unknown:** It is not known whether or not the vessel burned at the time of the casualty

The *Bunker Hill* is classified as Medium Risk because there was a report of fire at the time of casualty. Data quality is high.

#### **Risk Factor C2: Reported Oil on the Water**

This risk factor addresses reports of oil on the water at the time of the vessel casualty. The amount is relative and based on the number of available reports of the casualty. Seldom are the reports from trained observers so this is very subjective information. The risk categories are defined as:

- **Low Risk:** Large amounts of oil reported on the water by multiple sources
- **Medium Risk:** Moderate to little oil reported on the water during or after the sinking event
- **High Risk:** No oil reported on the water
- **Unknown:** It is not known whether or not there was oil on the water at the time of the casualty

The *Bunker Hill* is classified as Medium Risk because oil was reported to have spread across the water as the vessel went down. Data quality is high.

### ***Is the cargo area damaged?***

#### **Risk Factor D1: Nature of the Casualty**

This risk factor addresses the means by which the vessel sank. The risk associated with each type of casualty is determined by the how violent the sinking event was and the factors that would contribute to increased initial damage or destruction of the vessel (which would lower the risk of oil, other cargo, or munitions remaining on board). The risk categories are:

- **Low Risk:** Multiple torpedo detonations, multiple mines, severe explosion
- **Medium Risk:** Single torpedo, shellfire, single mine, rupture of hull, breaking in half, grounding on rocky shoreline
- **High Risk:** Foul weather, grounding on soft bottom, collision
- **Unknown:** The cause of the loss of the vessel is not known

The *Bunker Hill* is classified as Low Risk because there was a severe explosion, and the vessel is broken into two sections. Data quality is high.

#### **Risk Factor D2: Structural Breakup**

This risk factor takes into account how many pieces the vessel broke into during the sinking event or since sinking. This factor addresses how likely it is that multiple components of a ship were broken apart including tanks, valves, and pipes. Experience has shown that even vessels broken in three large sections can still have significant pollutants on board if the sections still have some structural integrity. The risk categories are:

- **Low Risk:** The vessel is broken into more than three pieces
- **Medium Risk:** The vessel is broken into two-three pieces
- **High Risk:** The vessel is not broken and remains as one contiguous piece
- **Unknown:** It is currently not known whether or not the vessel broke apart at the time of loss or after sinking

The *Bunker Hill* is classified as Medium Risk because it is broken into two pieces. Data quality is high.

### **Factors That May Impact Potential Operations**

#### **Orientation (degrees)**

This factor addresses what may be known about the current orientation of the intact pieces of the wreck (with emphasis on those pieces where tanks are located) on the seafloor. For example, if the vessel turtled, not only may it have avoided demolition as a hazard to navigation, but it has a higher likelihood of retaining an oil cargo in the non-vented and more structurally robust bottom of the hull.

*Bunker Hill* is resting on its side. Data quality is high.

#### **Depth**

Depth information is provided where known. In many instances, depth will be an approximation based on charted depths at the last known locations.

*Bunker Hill* is 280 feet deep. Data quality is high.

**Visual or Remote Sensing Confirmation of Site Condition**

This factor takes into account what the physical status of wreck site as confirmed by remote sensing or other means such as ROV or diver observations and assesses its capability to retain a liquid cargo. This assesses whether or not the vessel was confirmed as entirely demolished as a hazard to navigation, or severely compromised by other means such as depth charges, aerial bombs, or structural collapse.

The location of the *Bunker Hill* is a technical dive site. Data quality is high.

**Other Hazardous (Non-Oil) Cargo on Board**

This factor addresses hazardous cargo other than oil that may be on board the vessel and could potentially be released, causing impacts to ecological and socio-economic resources at risk.

There are no reports of hazardous materials onboard. Data quality is high.

**Munitions on Board**

This factor addresses hazardous cargo other than oil that may be on board the vessel and could potentially be released or detonated causing impacts to ecological and socio-economic resources at risk.

The *Bunker Hill* did not have any munitions onboard. Data quality is high.

**Vessel Pollution Potential Summary**

Table 1-1 summarizes the risk factor scores for the pollution potential and mitigating factors that would reduce the pollution potential for the *Bunker Hill*. Operational factors are listed but do not have a risk score.

**Table 1-1:** Summary matrix for the vessel risk factors for the *Bunker Hill* color-coded as red (high risk), yellow (medium risk), and green (low risk).

Vessel Risk Factors		Data Quality Score	Comments	Risk Score
Pollution Potential Factors	A1: Oil Volume (total bbl)	High	Maximum of 1,713 bbl. not reported to be leaking	Med
	A2: Oil Type	High	Cargo is heavy fuel oil, a Group IV oil type	
	B: Wreck Clearance	High	Vessel not reported as cleared	
	C1: Burning of the Ship	High	Fire and explosion was reported	
	C2: Oil on Water	High	Oil was reported on the water, amount is not known	
	D1: Nature of Casualty	High	Severe explosion	
	D2: Structural Breakup	High	The vessel broke in two at the time of sinking	
Archaeological Assessment	Archaeological Assessment	Low	The best sinking assessment comes from the U.S. Coast Guard; a detailed archaeological assessment was not prepared	Not Scored
Operational Factors	Wreck Orientation	High	The wreck is resting on its side	Not Scored
	Depth	High	The wreck is 280 feet deep	
	Visual or Remote Sensing Confirmation of Site Condition	High	The wreck is a technical diving site	
	Other Hazardous Materials Onboard	High	No	
	Munitions Onboard	High	No	
	Gravesite (Civilian/Military)	High	Yes	
	Historical Protection Eligibility (NHPA/SMCA)	Low	Unknown, full National Register of Historic Places assessment should be conducted	

## SECTION 2: ENVIRONMENTAL IMPACT MODELING

To help evaluate the potential transport and fates of releases from sunken wrecks, NOAA worked with RPS ASA to run a series of generalized computer model simulations of potential oil releases. The results are used to assess potential impacts to ecological and socio-economic resources, as described in Sections 3 and 4. The modeling results are useful for this screening-level risk assessment; however, it should be noted that detailed site/vessel/and seasonally specific modeling would need to be conducted prior to any intervention on a specific wreck.

### Release Scenarios Used in the Modeling

The potential volume of leakage at any point in time will tend to follow a probability distribution. Most discharges are likely to be relatively small, though there could be multiple such discharges. There is a lower probability of larger discharges, though these scenarios would cause the greatest damage. A **Worst Case Discharge** (WCD) would involve the release of all of the cargo oil and bunkers present on the vessel. In the case of the *Bunker Hill* this would be about 2,000 bbl (rounded up from 1,713 bbl) based on current estimates of the amount of oil remaining onboard the wreck.

The likeliest scenario of oil release from most sunken wrecks, including the *Bunker Hill*, is a small, episodic release that may be precipitated by disturbance of the vessel in storms. Each of these episodic releases may cause impacts and require a response. **Episodic** releases are modeled using 1% of the WCD. Another scenario is a very low chronic release, i.e., a relatively regular release of small amounts of oil that causes continuous oiling and impacts over the course of a long period of time. This type of release would likely be precipitated by corrosion of piping that allows oil to flow or bubble out at a slow, steady rate. **Chronic** releases are modeled using 0.1% of the WCD.

The **Most Probable** scenario is premised on the release of all the oil from one tank. In the absence of information on the number and condition of the cargo or fuel tanks for all the wrecks being assessed, this scenario is modeled using 10% of the WCD. The **Large** scenario is loss of 50% of the WCD. The five major types of releases are summarized in Table 2-1. The actual type of release that occurs will depend on the condition of the vessel, time factors, and disturbances to the wreck. Note that, the episodic and chronic release scenarios represent a small release that is repeated many times, potentially repeating the same magnitude and type of impact(s) with each release. The actual impacts would depend on the environmental factors such as real-time and forecast winds and currents during each release and the types/quantities of ecological and socio-economic resources present.

The model results here are based on running the RPS ASA Spill Impact Model Application Package (SIMAP) two hundred times for each of the five spill volumes shown in Table 2-1. The model randomly selects the date of the release, and corresponding environmental, wind, and ocean current information from a long-term wind and current database.

When a spill occurs, the trajectory, fate, and effects of the oil will depend on environmental variables, such as the wind and current directions over the course of the oil release, as well as seasonal effects. The magnitude and nature of potential impacts to resources will also generally have a strong seasonal component (e.g., timing of bird migrations, turtle nesting periods, fishing seasons, and tourism seasons).

**Table 2-1:** Potential oil release scenario types for the *Bunker Hill*.

Scenario Type	Release per Episode	Time Period	Release Rate	Relative Likelihood	Response Tier
<b>Chronic (0.1% of WCD)</b>	2 bbl	Fairly regular intervals or constant	100 bbl over several days	More likely	Tier 1
<b>Episodic (1% of WCD)</b>	20 bbl	Irregular intervals	Over several hours or days	Most Probable	Tier 1-2
<b>Most Probable (10% of WCD)</b>	200 bbl	One-time release	Over several hours or days	Most Probable	Tier 2
<b>Large (50% of WCD)</b>	1,000 bbl	One-time release	Over several hours or days	Less likely	Tier 2-3
<b>Worst Case</b>	2,000 bbl	One-time release	Over several hours or days	Least likely	Tier 3

The modeling results represent 200 simulations for each spill volume with variations in spill trajectory based on winds and currents. The spectrum of the simulations gives a perspective on the variations in likely impact scenarios. Some resources will be impacted in nearly all cases; some resources may not be impacted unless the spill trajectory happens to go in that direction based on winds and currents at the time of the release and in its aftermath.

For the large and WCD scenarios, the duration of the release was assumed to be 12 hours, envisioning a storm scenario where the wreck is damaged or broken up, and the model simulations were run for a period of 30 days. The releases were assumed to be from a depth between 2-3 meters above the sea floor, using the information known about the wreck location and depth. It is important to acknowledge that these scenarios are only for this screening-level assessment. Detailed site/vessel/and seasonally specific modeling would need to be conducted prior to any intervention on a specific wreck.

**Oil Type for Release**

The *Bunker Hill* contained a maximum of 1,713 bbl of bunker fuel oil (a Group IV oil). Thus, the oil spill model was run using heavy fuel oil.

**Oil Thickness Thresholds**

The model results are reported for different oil thickness thresholds, based on the amount of oil on the water surface or shoreline and the resources potentially at risk. Table 2-2 shows the terminology and thicknesses used in this report, for both oil thickness on water and the shoreline. For oil on the water surface, a thickness of 0.01 g/m<sup>2</sup>, which would appear as a barely visible sheen, was used as the threshold for socio-economic impacts because often fishing is prohibited in areas with any visible oil, to prevent contamination of fishing gear and catch. A thickness of 10 g/m<sup>2</sup> was used as the threshold for ecological impacts, primarily due to impacts to birds, because that amount of oil has been observed to be enough to mortally impact birds and other wildlife. In reality, it is very unlikely that oil would be evenly distributed on the water surface. Spilled oil is always distributed patchily on the water surface in bands or tarballs with clean water in between. So, Table 2-2a shows the number of tarballs per acre on the water surface for these oil thickness thresholds, assuming that each tarball was a sphere that was 1 inch in diameter.

For oil stranded onshore, a thickness of 1 g/m<sup>2</sup> was used as the threshold for socio-economic impacts because that amount of oil would conservatively trigger the need for shoreline cleanup on amenity

beaches. A thickness of 100 g/m<sup>2</sup> was used as the threshold for ecological impacts based on a synthesis of the literature showing that shoreline life has been affected by this degree of oiling.<sup>2</sup> Because oil often strands onshore as tarballs, Table 2-2b shows the number of tarballs per m<sup>2</sup> on the shoreline for these oil thickness thresholds, assuming that each tarball was a sphere that was 1 inch in diameter.

**Table 2-2a:** Oil thickness thresholds used in calculating area of water impacted. Refer to Sections 3 and 4 for explanations of the thresholds for ecological and socio-economic resource impacts.

Oil Description	Sheen Appearance	Approximate Sheen Thickness		No. of 1 inch Tarballs	Threshold/Risk Factor
Oil Sheen	Barely Visible	0.00001 mm	0.01 g/m <sup>2</sup>	~5-6 tarballs per acre	Socio-economic Impacts to Water Surface/Risk Factor 4B-1 and 2
Heavy Oil Sheen	Dark Colors	0.01 mm	10 g/m <sup>2</sup>	~5,000-6,000 tarballs per acre	Ecological Impacts to Water Surface/ Risk Factor 3B-1 and 2

**Table 2-2b:** Oil thickness thresholds used in calculating miles of shoreline impacted. Refer to Sections 3 and 4 for explanations of the thresholds for ecological and socio-economic resource impacts.

Oil Description	Oil Appearance	Approximate Sheen Thickness		No. of 1 inch Tarballs	Threshold/Risk Factor
Oil Sheen/Tarballs	Dull Colors	0.001 mm	1 g/m <sup>2</sup>	~0.12-0.14 tarballs/m <sup>2</sup>	Socio-economic Impacts to Shoreline Users/Risk Factor 4C-1 and 2
Oil Slick/Tarballs	Brown to Black	0.1 mm	100 g/m <sup>2</sup>	~12-14 tarballs/m <sup>2</sup>	Ecological Impacts to Shoreline Habitats/Risk Factor 3C-1 and 2

### Potential Impacts to the Water Column

Impacts to the water column from an oil release from the *Bunker Hill* will be determined by the volume of leakage. Because oil from sunken vessels will be released at low pressures, the droplet sizes will be large enough for the oil to float to the surface. Therefore, impacts to water column resources will result from the natural dispersion of the floating oil slicks on the surface, which is limited to about the top 33 feet. The metric used for ranking impacts to the water column is the area of water surface in mi<sup>2</sup> that has been contaminated by 1 part per billion (ppb) oil to a depth of 33 feet. At 1 ppb, there are likely to be impacts to sensitive organisms in the water column and potential tainting of seafood, so this concentration is used as a screening threshold for both the ecological and socio-economic risk factors for water column resource impacts. To assist planners in understanding the scale of potential impacts for different leakage volumes, a regression curve was generated for the water column volume oiled using the five volume scenarios, which is shown in Figure 2-1. Using this figure, the water column impacts can be estimated for any spill volume.

<sup>2</sup> French, D., M. Reed, K. Jayko, S. Feng, H. Rines, S. Pavignano, T. Isaji, S. Puckett, A. Keller, F. W. French III, D. Gifford, J. McCue, G. Brown, E. MacDonald, J. Quirk, S. Natzke, R. Bishop, M. Welsh, M. Phillips and B.S. Ingram, 1996. The CERCLA type A natural resource damage assessment model for coastal and marine environments (NRDAM/CME), Technical Documentation, Vol. I - V. Final Report. Office of Environmental Policy and Compliance, U.S. Dept. Interior, Washington, DC.

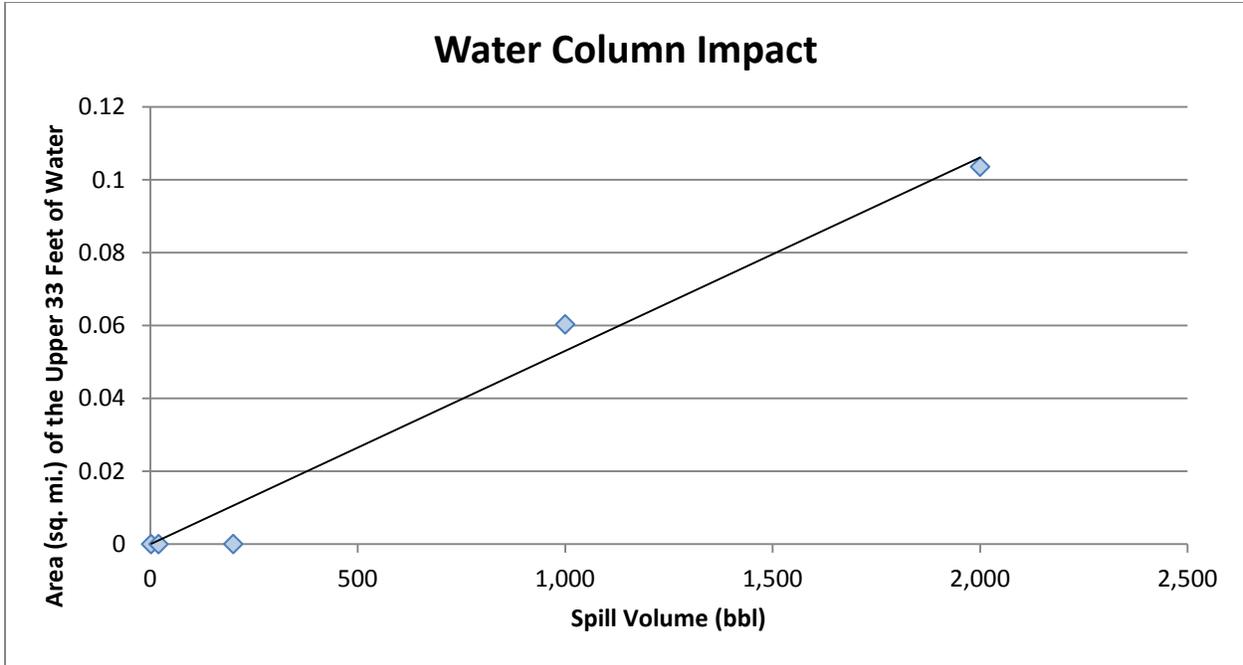


Figure 2-1: Regression curve for estimating the volume of water column at or above 1 ppb aromatics impacted as a function of spill volume for the *Bunker Hill*.

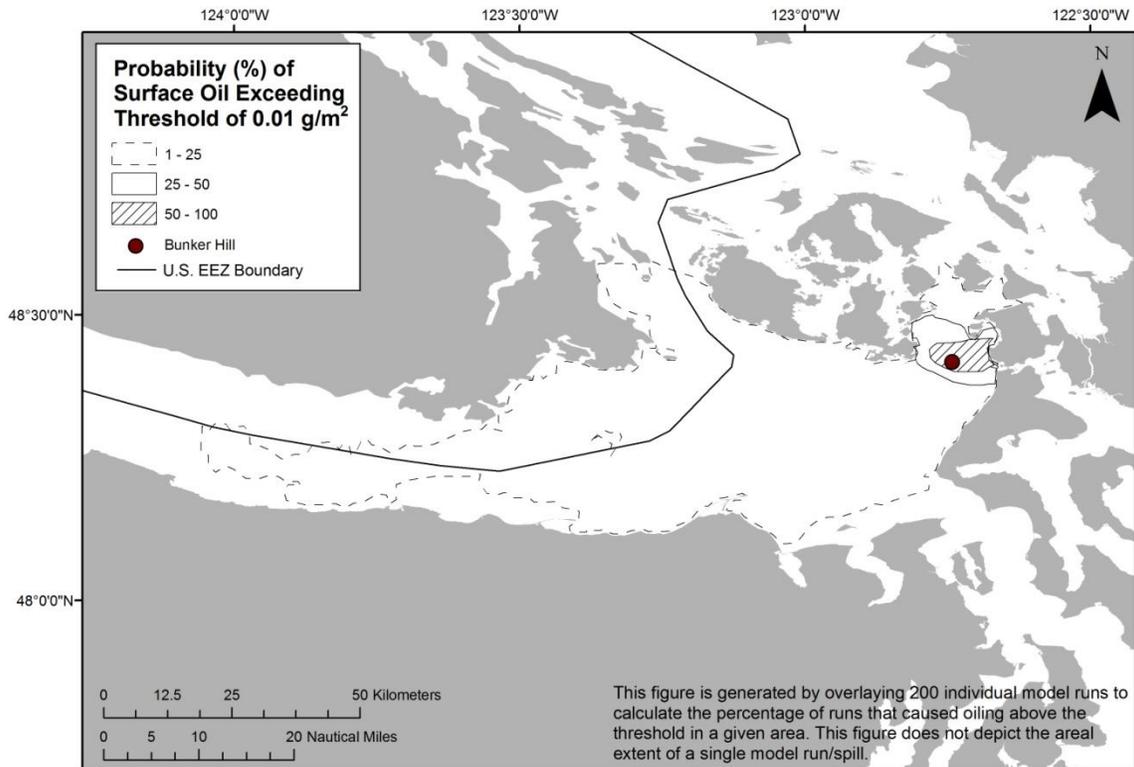
**Potential Water Surface Slick**

The slick size from an oil release from the *Bunker Hill* is a function of the quantity released. The estimated water surface coverage by a fresh slick (the total water surface area “swept” by oil over time) for the various scenarios is shown in Table 2-3, as the mean result of the 200 model runs. Note that this is an estimate of total water surface affected over a 30-day period. In the model, the representative heavy fuel oil used for this analysis spreads to a minimum thickness of approximately 975 g/m<sup>2</sup>, and is not able to spread any thinner. As a result, water surface oiling results are identical for the 0.01 and 10 g/m<sup>2</sup> thresholds. The slick will not be continuous but rather be broken and patchy due to the subsurface release of the oil. Surface expression is likely to be in the form of sheens, tarballs, and streamers.

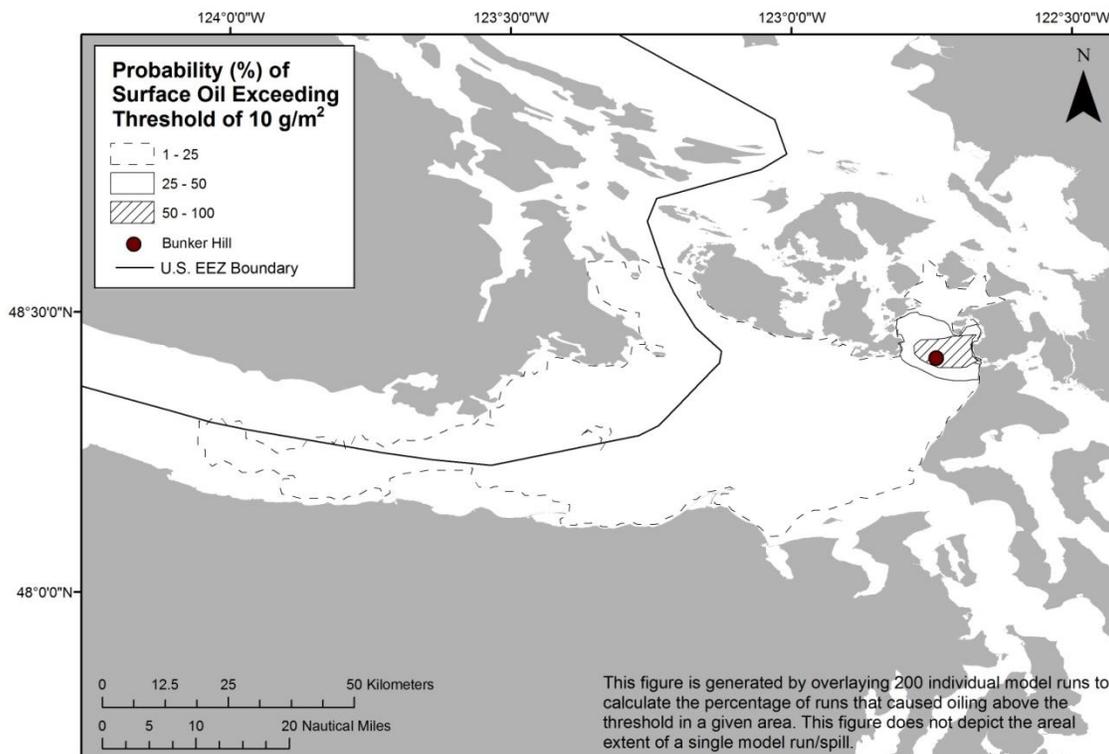
Table 2-3: Estimated slick area swept on water for oil release scenarios from the *Bunker Hill*.

Scenario Type	Oil Volume (bbl)	Estimated Slick Area Swept Mean of All Models	
		0.01 g/m <sup>2</sup>	10 g/m <sup>2</sup>
Chronic	2	2 mi <sup>2</sup>	2 mi <sup>2</sup>
Episodic	20	9 mi <sup>2</sup>	9 mi <sup>2</sup>
Most Probable	200	30 mi <sup>2</sup>	30 mi <sup>2</sup>
Large	1,000	88 mi <sup>2</sup>	88 mi <sup>2</sup>
Worst Case Discharge	2,000	152 mi <sup>2</sup>	152 mi <sup>2</sup>

The location, size, shape, and spread of the oil slick(s) from an oil release will depend on environmental conditions, including winds and currents, at the time of release and in its aftermath. The areas potentially affected by oil slicks, given that we cannot predict when the spill might occur and the range of possible wind and current conditions that might prevail after a release, are shown in Figure 2-2 and Figure 2-3 using the Most Probable volume and the socio-economic and ecological thresholds.

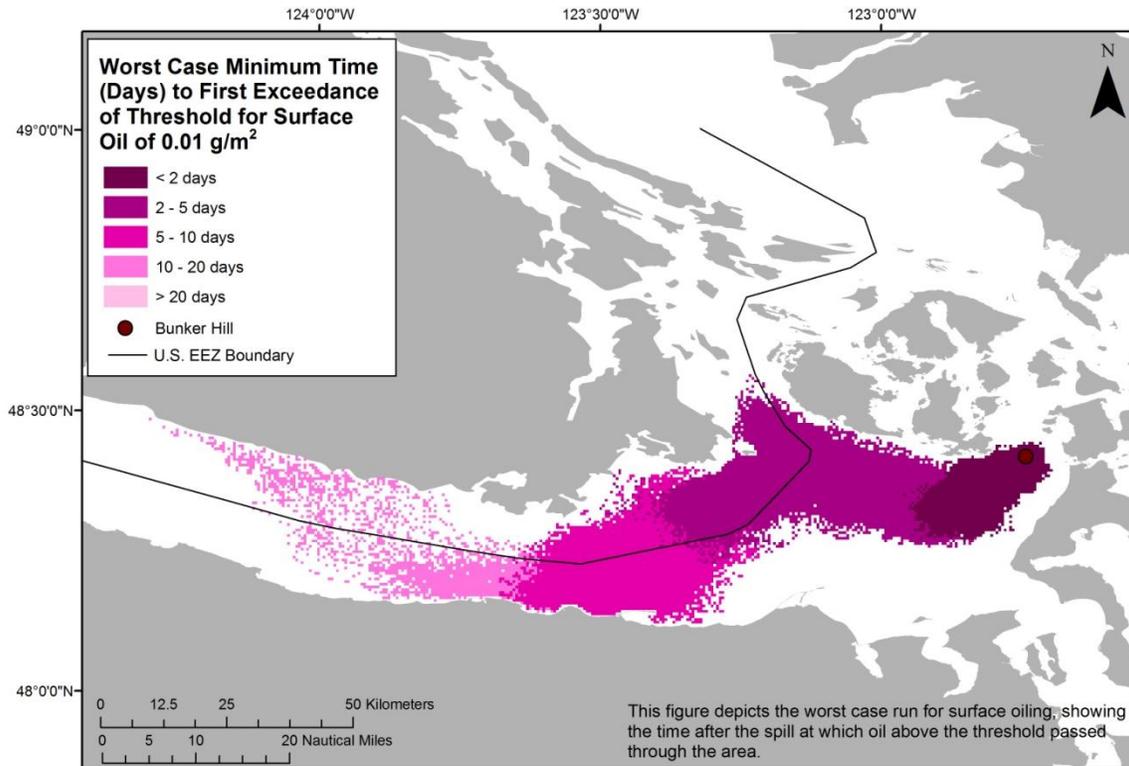


**Figure 2-2:** Probability of surface oil (exceeding 0.01 g/m<sup>2</sup>) from the Most Probable spill of 200 bbl of heavy fuel oil from the *Bunker Hill* at the threshold for socio-economic resources at risk.



**Figure 2-3:** Probability of surface oil (exceeding 10 g/m<sup>2</sup>) from the Most Probable spill of 200 bbl of heavy fuel oil from the *Bunker Hill* at the threshold for ecological resources at risk.

The maximum potential cumulative area swept by oil slicks at some time after a Most Probable discharge is shown in Figure 2-4 as the timing of oil movements.



**Figure 2-4:** Water surface oiling from the Most Probable spill of 200 bbl of heavy fuel oil from the *Bunker Hill* shown as the area over which the oil spreads at different time intervals.

The actual area affected by a release will be determined by the volume of leakage, whether it is from one or more tanks at a time. To assist planners in understanding the scale of potential impacts for different leakage volumes, a regression curve was generated for the water surface area oiled using the five volume scenarios, which is shown in Figure 2-5. Using this figure, the area of water surface with a barely visible sheen can be estimated for any spill volume.

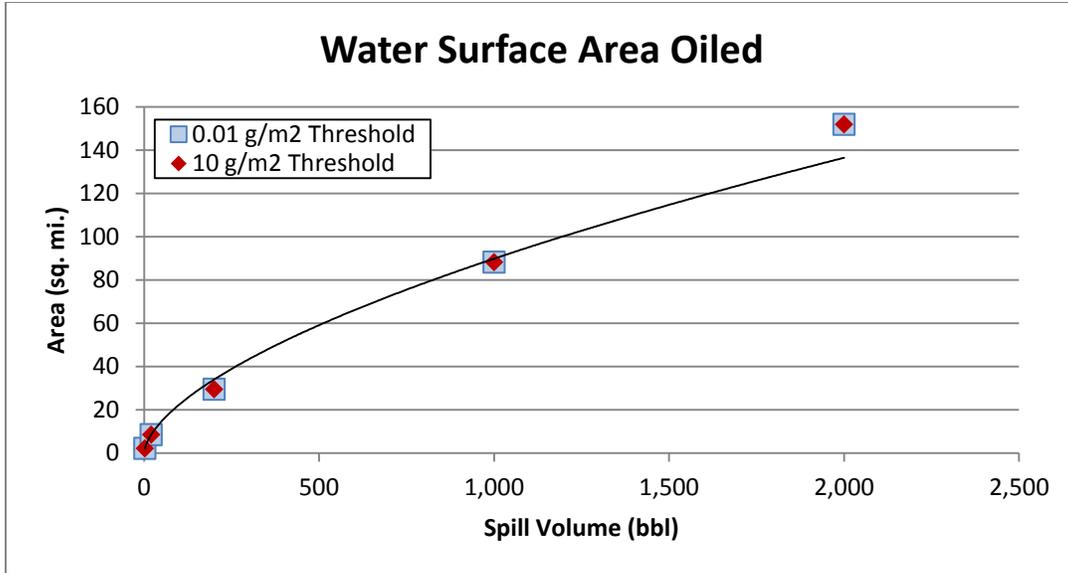


Figure 2-5: Regression curve for estimating the amount of water surface oiling as a function of spill volume for the *Bunker Hill*, showing both the ecological threshold of 10 g/m<sup>2</sup> and socio-economic threshold of 0.01 g/m<sup>2</sup>.

**Potential Shoreline Impacts**

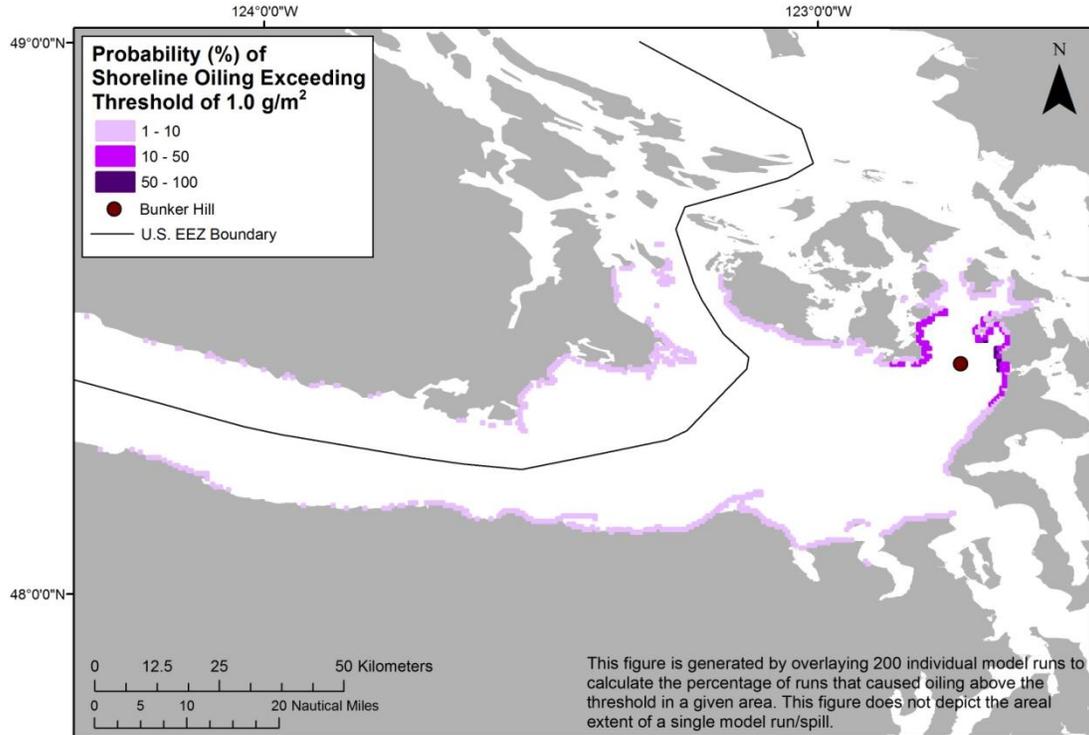
Based on these modeling results, shorelines from the San Juan Islands to both sides of the Strait of Juan de Fuca are at risk. Figure 2-6 shows the probability of oil stranding on the shoreline at concentrations that exceed the threshold of 1 g/m<sup>2</sup>, for the Most Probable release of 200 bbl. However, the specific areas that would be oiled will depend on the currents and winds at the time of the oil release(s), as well as on the amount of oil released. Figure 2-7 shows the single oil spill scenario that resulted in the maximum extent of shoreline oiling for the Most Probable volume. Estimated miles of shoreline oiling above the threshold of 1 g/m<sup>2</sup> by scenario type are shown in Table 2-4.

Table 2-4a: Estimated shoreline oiling from leakage from the *Bunker Hill*. (U.S. and Canada).

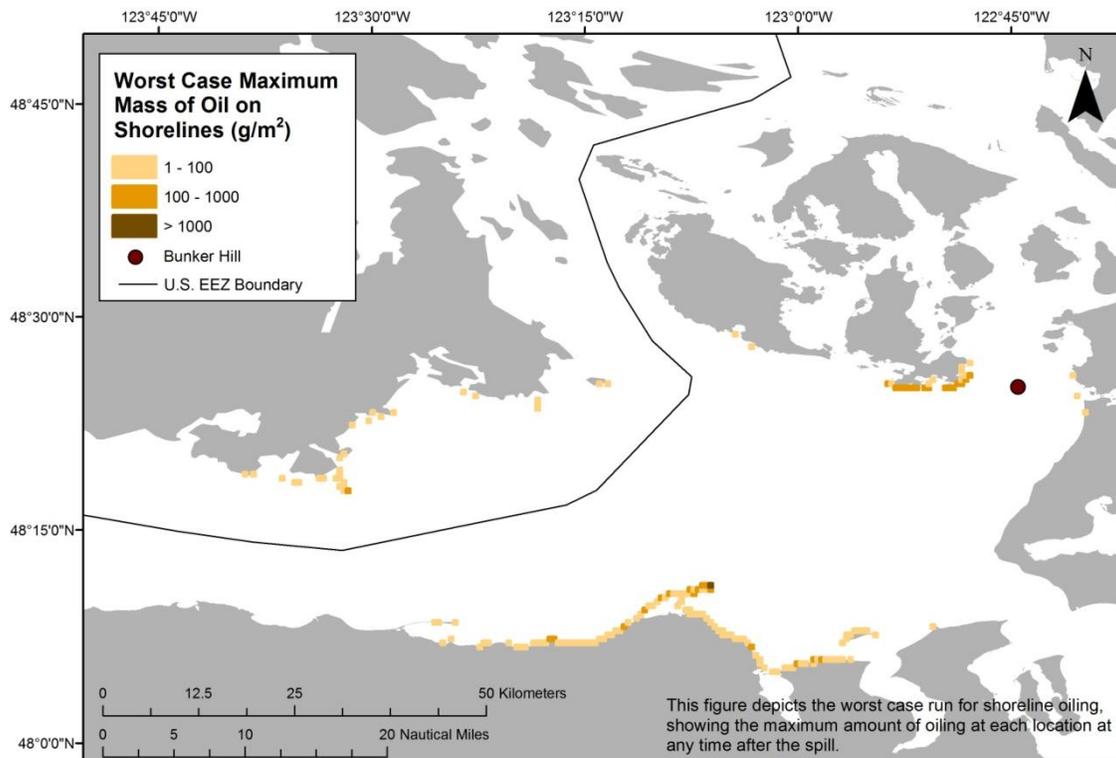
Scenario Type	Volume (bbl)	Estimated Miles of Shoreline Oiling Above 1 g/m <sup>2</sup>			
		Rock/Gravel/Artificial	Sand	Wetland/Mudflat	Total
Chronic	2	1	0	0	1
Episodic	20	2	0	0	2
Most Probable	200	4	0	0	4
Large	1,000	5	0	0	6
Worst Case Discharge	2,000	7	1	0	7

Table 2-4b: Estimated shoreline oiling from leakage from the *Bunker Hill*. (U.S. only).

Scenario Type	Volume (bbl)	Estimated Miles of Shoreline Oiling Above 1 g/m <sup>2</sup>			
		Rock/Gravel/Artificial	Sand	Wetland/Mudflat	Total
Chronic	2	1	0	0	1
Episodic	20	2	0	0	2
Most Probable	200	4	0	0	4
Large	1,000	5	0	0	6
Worst Case Discharge	2,000	6	0	0	7

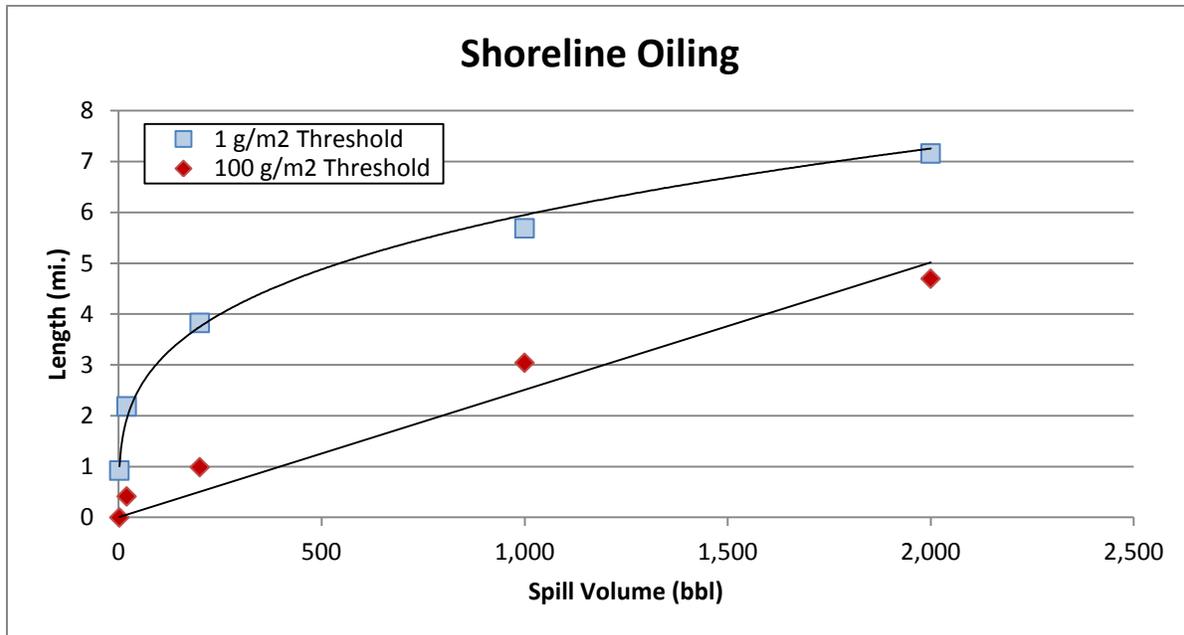


**Figure 2-6:** Probability of shoreline oiling (exceeding 1.0 g/m<sup>2</sup>) from the Most Probable Discharge of 200 bbl of heavy fuel oil from the *Bunker Hill*.



**Figure 2-7:** The extent and degree of shoreline oiling from the single model run of the Most Probable Discharge of 200 bbl of heavy fuel oil from the *Bunker Hill* that resulted in the greatest shoreline oiling.

The actual shore length affected by a release will be determined by the volume of leakage. To assist planners in scaling the potential impact for different leakage volumes, a regression curve was generated for the total shoreline length oiled using the five volume scenarios, which is shown in Figure 2-8. Using this figure, the shore length oiled can be estimated for any spill volume.



**Figure 2-8:** Regression curve for estimating the amount of shoreline oiling at different thresholds as a function of spill volume for the *Bunker Hill*.

*The worst case scenario for shoreline exposure* along the potentially impacted area for the WCD volume (Table 2-5) and the Most Probable volume (Table 2-6) consists primarily of grave beaches and rocky shores.

**Table 2-5:** Worst case scenario shoreline impact by habitat type and oil thickness for a leakage of 2,000 bbl from the *Bunker Hill*.

Shoreline/Habitat Type	Lighter Oiling Oil Thickness <1 mm Oil Thickness >1 g/m <sup>2</sup>	Heavier Oiling Oil Thickness >1 mm Oil Thickness >100 g/m <sup>2</sup>
Rocky and artificial shores/Gravel beaches	23 miles	14 miles
Sand beaches	0 miles	0 miles
Salt marshes and tidal flats	0 miles	0 miles

**Table 2-6:** Worst case scenario shoreline impact by habitat type and oil thickness for a leakage of 200 bbl from the *Bunker Hill*.

Shoreline/Habitat Type	Lighter Oiling Oil Thickness <1 mm Oil Thickness >1 g/m <sup>2</sup>	Heavier Oiling Oil Thickness >1 mm Oil Thickness >100 g/m <sup>2</sup>
Rocky and artificial shores/Gravel beaches	20 miles	2 miles
Sand beaches	0 miles	0 miles
Salt marshes and tidal flats	0 miles	0 miles

## SECTION 3: ECOLOGICAL RESOURCES AT RISK

Ecological resources at risk from a catastrophic release of oil from the *Bunker Hill* (Table 3-1) include numerous guilds of birds, particularly those sensitive to surface oiling while rafting or plunge diving to feed and are present in nearshore/offshore waters. Large numbers of birds winter or stopover in the area of impact. Beaches and nearshore habitats are important spawning locations for forage fish populations, which are an important food sources for birds, larger fish and marine mammals in the area. Waters in the region of interest are heavily used by resident populations of killer whales and harbor seals. The Salish Sea is the second largest estuary in the U.S. and is a hotspot for marine biodiversity.

**Table 3-1:** Ecological resources at risk from a release of oil from the *Bunker Hill*.

(\*FT = Federal threatened; FE = Federal endangered; ST = State threatened; SE = State endangered).

Species Group	Species Subgroup and Geography	Seasonal Presence
<b>Seabirds</b>	<p>Commonly found in the area: Ancient murrelet, pigeon guillemot, common murre spp., rhinoceros auklet, common loon, cormorant, Pacific loon, red-throated loon, western grebe, gulls, shorebirds, bufflehead, goldeneye, harlequin duck, long-tailed duck, scaup, scoters, waterfowl, great blue heron, bald eagle</p> <p>Productive waters of the Juan de Fuca Strait support large populations of foraging and nesting seabirds</p> <ul style="list-style-type: none"> <li>• Marbled murrelets (FT) common</li> <li>• Seabird nesting colonies present at Race Rocks, Port Angeles, Dungeness Bay; alcids, cormorants and black oystercatcher are common colonial nesters</li> <li>• High abundance of great blue heron in the area nesting at Freshwater Bay</li> <li>• Bald eagle nests common along the Strait</li> <li>• Port Angeles Harbor: Thousands of gulls, regularly &gt;100 great blue heron, largest wintering concentrations of Barrow's and common goldeneyes, and harlequin duck on northern Olympic Peninsula</li> </ul> <p><i>Dungeness Bay</i></p> <ul style="list-style-type: none"> <li>• Sandflats and mudflats are foraging area for 10,000s of shorebirds, gulls and waterfowl migrating and wintering</li> <li>• Brant, diving ducks, seabirds, loons, grebes, and diving birds forage in eelgrass beds</li> </ul> <p><i>Protection Island</i></p> <ul style="list-style-type: none"> <li>• Significant populations of cormorants, gulls, pigeon guillemot, rhinoceros auklet, and tufted puffin</li> </ul> <p><i>San Juan Islands</i></p> <ul style="list-style-type: none"> <li>• Several islands support colonies of nesting seabirds, including cormorants, pigeon guillemot, and gulls</li> </ul> <p><i>Deception Pass</i></p> <ul style="list-style-type: none"> <li>• Large numbers of common and Pacific loon, cormorants, grebes, mergansers, and alcids foraging in the winter</li> <li>• Large numbers of red-throated loons from Nov-Apr, peak Dec-Feb</li> <li>• Black oystercatcher present in winter, nesting on at least 1 island in summer</li> <li>• Greater than 300 pigeon guillemots mate and nest on cliffs</li> </ul>	<p>Bufflehead: Nov-Apr Ancient murrelet: Nov-Apr Murre: Aug-Mar Loons: Sep-May Grebes: Oct-Apr Scoters: Aug-May Waterfowl: Sep-Jun Rhinoceros auklet: Mar-Sep</p> <p>Pigeon guillemot present year round, nests Jul-Aug</p> <p>Shorebirds most common spring/fall</p> <p><i>Nesting</i> Gulls: May-Sep Harlequin ducks: Apr-Aug Great blue herons: Feb-Jul</p>

Section 3: Ecological Resources at Risk

Species Group	Species Subgroup and Geography	Seasonal Presence
	<p><i>Chain Islets and Great Chain Islet</i></p> <ul style="list-style-type: none"> <li>• Largest colony of glaucous-winged gull in British Columbia</li> <li>• Up to 2,000 Brandt's cormorants (&gt;2% of the world population); pelagic cormorants also present in low abundance</li> <li>• Other nesting species include double-crested cormorant (100s), pigeon guillemot, and black oystercatcher</li> <li>• Harlequin duck found seasonally</li> </ul>	
<b>Marine Mammals</b>	<p>Harbor seal haul-outs and rookeries are common throughout the area of impact</p> <ul style="list-style-type: none"> <li>• High densities (counts &gt; 500) recorded at Smith and Minor Island</li> <li>• Areas with large aggregations (counts &gt;100) recorded: Colville Island, Goose Island, Race Rocks, Chain Isles, Trial Islands, D'Arcy Island, Williamson Rocks</li> <li>• Population size ~7,000 in the Salish sea, 4,000 in San Juan County</li> </ul> <p>Elephant seals can be found at Dungeness Spit and on Smith/Minor Islands. Some pupping has been observed but not in high numbers</p> <p>Trial Island and Race Rocks are haul-outs for California (common) and Steller sea lions (FT; less common)</p>	<p>Harbor seals pup May-Aug, molt Aug-Oct</p> <p>Steller sea lions more common in winter</p> <p>California sea lions present Sep-May</p>
<b>Cetaceans</b>	<p><i>Common:</i> Gray whale, killer whale (FE), minke whale, harbor porpoise, Dall's porpoise all commonly occur in interior waters</p> <ul style="list-style-type: none"> <li>• Interior Washington waters are critical habitat for killer whale</li> <li>• Southern resident population of killer whale (87 animals) common in inland waters (especially Haro and Rosario Straits); disperse to coastal ocean during the winter</li> <li>• Inland Washington harbor porpoise population estimate is 10,682</li> <li>• Salish sea Dall's porpoise population estimate is ~2,600</li> </ul> <p><i>Rare or present in low abundance:</i> humpback whale (FE), Pacific white-sided dolphin</p>	<p>Minke whales present spring-fall</p> <p>Gray whales present Feb-Dec, calves present in spring</p> <p>Harbor porpoises present year round, calve Jun-Aug</p>
<b>Fish &amp; Invertebrates</b>	<p><i>Anadromous</i></p> <ul style="list-style-type: none"> <li>• Chinook salmon (FT), coho salmon (FE), steelhead (FT), bull trout (FT), chum salmon, pink salmon, sockeye salmon, coastal cutthroat trout and green sturgeon (FT) populations spawn in coastal rivers</li> <li>• Elwha River is critical habitat for eulachon (FT)</li> <li>• Southern shore of Juan de Fuca strait is green sturgeon critical habitat</li> <li>• Waters inland of Port Angeles are essential habitat for pink salmon</li> <li>• San Juan Islands are critical habitat for Chinook salmon</li> <li>• Juveniles and adults forage in estuarine and coastal environments</li> </ul> <p><i>Beach spawning fish</i></p> <ul style="list-style-type: none"> <li>• Surf smelt spawn in the upper intertidal zone of coarse sand/gravel beaches; eggs adhere to the substrate; spawning beaches are found along the south shore of Juan de Fuca Strait, near Anacortes and on Guss Island</li> <li>• Sand lance spawn on Whidbey Island, Mackaye Harbor, Dungeness Harbor and near Anacortes</li> </ul> <p><i>Intertidal fish and invertebrates</i></p> <ul style="list-style-type: none"> <li>• Rocky intertidal areas are habitat for tidepool sculpin, wolf eel, juvenile lingcod and greenling, gunnels, eelpouts, pricklebacks, cockcombs, and warbonnets</li> <li>• Beaches have high abundance and diversity of clams and other invertebrates, including Pacific oysters</li> </ul>	<p>Juvenile salmon migrate to coastal waters in the spring but are present year round</p> <p>Smelt spawn year round</p> <p>Herring spawn Jan-Apr</p> <p>Sand lance spawn Nov-Feb</p> <p>Oysters spawn in the summer</p>

Species Group	Species Subgroup and Geography	Seasonal Presence
	<p><i>Nearshore subtidal</i></p> <ul style="list-style-type: none"> <li>• Dungeness crab move nearshore to spawn near sand beaches</li> <li>• Pacific geoducks common in subtidal sandy beach areas</li> <li>• Pinto abalone present in nearshore subtidal habitats</li> <li>• Pacific herring spawn adhesive eggs on nearshore seagrass and algae in Dungeness Bay and Esquimalt Lagoon; adults form aggregations in nearshore waters prior to spawning</li> </ul> <p><i>Demersal</i></p> <ul style="list-style-type: none"> <li>• Many species of rockfish, including bocaccio (FE), canary rockfish (FT) and yelloweye rockfish (FT) are found in the area and can be associated with rocky reef habitats and kelp beds</li> <li>• Larval stages are found in epipelagic waters and juveniles recruit to structurally complex nearshore habitats</li> </ul>	<p>Rockfish and halibut spawn in deeper waters in winter/spring</p>
<b>Benthic Habitats</b>	<p>Extensive eelgrass beds are present in the Strait of Juan de Fuca from Dungeness Point west, along the southern shore of San Juan Islands, Oak Bay Islands, Burrows Bay and in Sooke Harbor</p> <ul style="list-style-type: none"> <li>• Dungeness Bay has one of the largest eelgrass beds in the western U.S.</li> </ul> <p>Large kelp beds are present along exposed shorelines inland to Port Townsend and in Burrows Bay</p> <p>Other species of kelp and turf grass common in intertidal areas</p>	<p>Kelp canopy is fullest Mar-Nov</p>

The Environmental Sensitivity Index (ESI) atlases for the potentially impacted coastal areas from a leak from the *Bunker Hill* are generally available at each U.S. Coast Guard Sector. They can also be downloaded at: <http://response.restoration.noaa.gov/esi>. These maps show detailed spatial information on the distribution of sensitive shoreline habitats, biological resources, and human-use resources. The tables on the back of the maps provide more detailed life-history information for each species and location. The ESI atlases should be consulted to assess the potential environmental resources at risk for specific spill scenarios. In addition, the Geographic Response Plans within the Area Contingency Plans prepared by the Area Committee for each U.S. Coast Guard Sector have detailed information on the nearshore and shoreline ecological resources at risk and should be consulted.

## Ecological Risk Factors

### Risk Factor 3: Impacts to Ecological Resources at Risk (EcoRAR)

Ecological resources include plants and animals (e.g., fish, birds, invertebrates, and mammals), as well as the habitats in which they live. All impact factors are based on a Worst Case and the Most Probable Discharge oil release from the wreck. Risk factors for ecological resources at risk (EcoRAR) are divided into three categories:

- Impacts to the water column and resources in the water column;
- Impacts to the water surface and resources on the water surface; and
- Impacts to the shoreline and resources on the shoreline.

The impacts from an oil release from the wreck would depend greatly on the direction in which the oil slick moves, which would, in turn, depend on wind direction and currents at the time of and after the oil release. Impacts are characterized in the risk analysis based on the likelihood of any measurable impact, as well as the degree of impact that would be expected if there is an impact. The measure of the degree of impact is based on the median case for which there is at least some impact. The median case is the “middle case” – half of the cases with significant impacts have less impact than this case, and half have more.

For each of the three ecological resources at risk categories, risk is defined as:

- The **probability of oiling** over a certain threshold (i.e., the likelihood that there will be an impact to ecological resources over a certain minimal amount); and
- The **degree of oiling** (the magnitude or amount of that impact).

As a reminder, the ecological impact thresholds are: 1 ppb aromatics for water column impacts; 10 g/m<sup>2</sup> for water surface impacts; and 100 g/m<sup>2</sup> for shoreline impacts.

In the following sections, the definition of low, medium, and high for each ecological risk factor is provided. Also, the classification for the *Bunker Hill* is provided, both as text and as shading of the applicable degree of risk bullet, for the WCD release of 2,000 bbl and a border around the Most Probable Discharge of 200 bbl.

### Risk Factor 3A: Water Column Impacts to EcoRAR

Water column impacts occur beneath the water surface. The ecological resources at risk for water column impacts are fish, marine mammals, and invertebrates (e.g., shellfish, and small organisms that are food for larger organisms in the food chain). These organisms can be affected by toxic components in the oil. The threshold for water column impact to ecological resources at risk is a dissolved aromatic hydrocarbons concentration of 1 ppb (i.e., 1 part total dissolved aromatics per one billion parts water). Dissolved aromatic hydrocarbons are the most toxic part of the oil. At this concentration and above, one would expect impacts to organisms in the water column.

#### Risk Factor 3A-1: Water Column Probability of Oiling of EcoRAR

This risk factor reflects the probability that at least 0.2 mi<sup>2</sup> of the upper 33 feet of the water column would be contaminated with a high enough concentration of oil to cause ecological impacts. The three risk scores for water column oiling probability are:

- **Low Oiling Probability:** Probability = <10%
- **Medium Oiling Probability:** Probability = 10 – 50%
- **High Oiling Probability:** Probability > 50%

#### Risk Factor 3A-2: Water Column Degree of Oiling of EcoRAR

The degree of oiling of the water column reflects the total volume of water that would be contaminated by oil at a concentration high enough to cause impacts. The three categories of impact are:

- **Low Impact:** impact on less than 0.2 mi<sup>2</sup> of the upper 33 feet of the water column at the threshold level

- **Medium Impact:** impact on 0.2 to 200 mi<sup>2</sup> of the upper 33 feet of the water column at the threshold level
- **High Impact:** impact on more than 200 mi<sup>2</sup> of the upper 33 feet of the water column at the threshold level

The *Bunker Hill* is classified as Low Risk for oiling probability for water column ecological resources for the WCD of 2,000 bbl because 1% of the model runs resulted in contamination of more than 0.2 mi<sup>2</sup> of the upper 33 feet of the water column above the threshold of 1 ppb aromatics. It is classified as Low Risk for degree of oiling because the mean volume of water contaminated was 0.1 mi<sup>2</sup> of the upper 33 feet of the water column. For the Most Probable Discharge of 200 bbl, the *Bunker Hill* is classified as Low Risk for oiling probability for water column ecological resources because 0% of the model runs resulted in contamination of more than 0.2 mi<sup>2</sup> of the upper 33 feet of the water column above the threshold of 1 ppb aromatics. It is classified as Low Risk for degree of oiling because the mean volume of water contaminated was 0 mi<sup>2</sup> of the upper 33 feet of the water column.

### Risk Factor 3B: Water Surface Impacts to EcoRAR

Ecological resources at risk at the water surface include surface feeding and diving sea birds, sea turtles, and marine mammals. These organisms can be affected by the toxicity of the oil as well as from coating with oil. The threshold for water surface oiling impact to ecological resources at risk is 10 g/m<sup>2</sup> (10 grams of floating oil per square meter of water surface). At this concentration and above, one would expect impacts to birds and other animals that spend time on the water surface.

#### Risk Factor 3B-1: Water Surface Probability of Oiling of EcoRAR

This risk factor reflects the probability that at least 1,000 mi<sup>2</sup> of the water surface would be affected by enough oil to cause impacts to ecological resources. The three risk scores for oiling are:

- **Low Oiling Probability:** Probability = <10%
- **Medium Oiling Probability:** Probability = 10 – 50%
- **High Oiling Probability:** Probability > 50%

#### Risk Factor 3B-2: Water Surface Degree of Oiling of EcoRAR

The degree of oiling of the water surface reflects the total amount of oil that would affect the water surface in the event of a discharge from the vessel. The three categories of impact are:

- **Low Impact:** less than 1,000 mi<sup>2</sup> of water surface impact at the threshold level
- **Medium Impact:** 1,000 to 10,000 mi<sup>2</sup> of water surface impact at the threshold level
- **High Impact:** more than 10,000 mi<sup>2</sup> of water surface impact at the threshold level

The *Bunker Hill* is classified as Low Risk for oiling probability for water surface ecological resources for the WCD because 0% of the model runs resulted in at least 1,000 mi<sup>2</sup> of the water surface affected above the threshold of 10 g/m<sup>2</sup>. It is classified as Low Risk for degree of oiling because the mean area of water contaminated was 152 mi<sup>2</sup>. The *Bunker Hill* is classified as Low Risk for oiling probability for water surface ecological resources for the Most Probable Discharge because 0% of the model runs resulted in at least 1,000 mi<sup>2</sup> of the water surface affected above the threshold of 10 g/m<sup>2</sup>. It is classified as Low Risk for degree of oiling because the mean area of water contaminated was 30 mi<sup>2</sup>.

**Risk Factor 3C: Shoreline Impacts to EcoRAR**

The impacts to different types of shorelines vary based on their type and the organisms that live on them. In this risk analysis, shorelines have been weighted by their degree of sensitivity to oiling. Wetlands are the most sensitive (weighted as “3” in the impact modeling), rocky and gravel shores are moderately sensitive (weighted as “2”), and sand beaches (weighted as “1”) are the least sensitive to ecological impacts of oil.

**Risk Factor 3C-1: Shoreline Probability of Oiling of EcoRAR**

This risk factor reflects the probability that the shoreline would be coated by enough oil to cause impacts to shoreline organisms. The threshold for shoreline oiling impacts to ecological resources at risk is 100 g/m<sup>2</sup> (i.e., 100 grams of oil per square meter of shoreline). The three risk scores for oiling are:

- **Low Oiling Probability:** Probability = <10%
- **Medium Oiling Probability:** Probability = 10 – 50%
- **High Oiling Probability:** Probability > 50%

**Risk Factor 3C-2: Shoreline Degree of Oiling of EcoRAR**

The degree of oiling of the shoreline reflects the length of shorelines oiled by at least 100 g/m<sup>2</sup> in the event of a discharge from the vessel. The three categories of impact are:

- **Low Impact:** less than 10 miles of shoreline impacted at the threshold level
- **Medium Impact:** 10 - 100 miles of shoreline impacted at the threshold level
- **High Impact:** more than 100 miles of shoreline impacted at the threshold level

The *Bunker Hill* is classified as High Risk for oiling probability for shoreline ecological resources for the WCD because 100% of the model runs resulted in shorelines affected above the threshold of 100 g/m<sup>2</sup>. It is classified as Low Risk for degree of oiling because the mean weighted length of shoreline contaminated was 9 miles. The *Bunker Hill* is classified as High Risk for oiling probability to shoreline ecological resources for the Most Probable Discharge because 94% of the model runs resulted in shorelines affected above the threshold of 100 g/m<sup>2</sup>. It is classified as Low Risk for degree of oiling because the mean weighted length of shoreline contaminated was 2 miles.

Considering the modeled risk scores and the ecological resources at risk, the ecological risk from potential releases of the WCD of 2,000 bbl of heavy fuel oil from the *Bunker Hill* is summarized as listed below and indicated in the far-right column in Table 3-2:

- Water column resources – Low, because of the low probability and very small area of potential exposure above the threshold of concern
- Water surface resources – Medium, because even with the small area of potential impact, there are seasonally very large number of wintering, nesting, and migratory birds that use ocean, coastal, and estuarine habitats at risk and winter concentrations of seals. It should be noted that oil on the surface will not be continuous but rather be broken and patchy and in the form of tarballs and streamers
- Shoreline resources – Low, because of the small amount of likely shoreline impact, which would affect mostly gravel beaches

**Table 3-2:** Ecological risk factor scores for the **Worst Case Discharge of 2,000 bbl** of heavy fuel oil from the *Bunker Hill*.

Risk Factor	Risk Score			Explanation of Risk Score	Final Score
3A-1: Water Column Probability EcoRAR Oiling	Low	Medium	High	1% of the model runs resulted in at least 0.2 mi <sup>2</sup> of the upper 33 feet of the water column contaminated above 1 ppb aromatics	Low
3A-2: Water Column Degree EcoRAR Oiling	Low	Medium	High	The mean volume of water contaminated above 1 ppb was 0.1 mi <sup>2</sup> of the upper 33 feet of the water column	
3B-1: Water Surface Probability EcoRAR Oiling	Low	Medium	High	0% of the model runs resulted in at least 1,000 mi <sup>2</sup> of water surface covered by at least 10 g/m <sup>2</sup>	Med
3B-2: Water Surface Degree EcoRAR Oiling	Low	Medium	High	The mean area of water contaminated above 10 g/m <sup>2</sup> was 152 mi <sup>2</sup>	
3C-1: Shoreline Probability EcoRAR Oiling	Low	Medium	High	100% of the model runs resulted in shoreline oiling of 100 g/m <sup>2</sup>	Low
3C-2: Shoreline Degree EcoRAR Oiling	Low	Medium	High	The length of shoreline contaminated by at least 100 g/m <sup>2</sup> was 9 mi	

For the Most Probable Discharge of 200 bbl, the ecological risk from potential releases of heavy fuel oil from the *Bunker Hill* is summarized as listed below and indicated in the far-right column in Table 3-3:

- Water column resources – Low, because no water column impacts are likely from such small releases of a heavy fuel oil
- Water surface resources – Low, because the likely area affected is smaller, but there are still a large number of birds and marine mammals at risk. It should be noted that oil on the surface will not be continuous but rather be broken and patchy and in the form of tarballs and streamers
- Shoreline resources – Low, because fewer miles of shoreline are at risk

**Table 3-3:** Ecological risk factor scores for the **Most Probable Discharge of 200 bbl** of heavy fuel oil from the *Bunker Hill*.

Risk Factor	Risk Score			Explanation of Risk Score	Final Score
	Low	Medium	High		
3A-1: Water Column Probability EcoRAR Oiling	Low	Medium	High	0% of the model runs resulted in at least 0.2 mi <sup>2</sup> of the upper 33 feet of the water column contaminated above 1 ppb aromatics	Low
3A-2: Water Column Degree EcoRAR Oiling	Low	Medium	High	The mean volume of water contaminated above 1 ppb was 0 mi <sup>2</sup> of the upper 33 feet of the water column	
3B-1: Water Surface Probability EcoRAR Oiling	Low	Medium	High	0% of the model runs resulted in at least 1,000 mi <sup>2</sup> of water surface covered by at least 10 g/m <sup>2</sup>	Low
3B-2: Water Surface Degree EcoRAR Oiling	Low	Medium	High	The mean area of water contaminated above 10 g/m <sup>2</sup> was 30 mi <sup>2</sup>	
3C-1: Shoreline Probability EcoRAR Oiling	Low	Medium	High	94% of the model runs resulted in shoreline oiling of 100 g/m <sup>2</sup>	Low
3C-2: Shoreline Degree EcoRAR Oiling	Low	Medium	High	The length of shoreline contaminated by at least 100 g/m <sup>2</sup> was 2 mi	

## SECTION 4: SOCIO-ECONOMIC RESOURCES AT RISK

In addition to natural resource impacts, spills from sunken wrecks have the potential to cause significant social and economic impacts. Socio-economic resources potentially at risk from oiling are listed in Table 4-1 and shown in Figures 4-1 and 4-2. The potential economic impacts include disruption of coastal economic activities such as commercial and recreational fishing, boating, vacationing, commercial shipping, and other activities that may become claims following a spill.

Socio-economic resources in the areas potentially affected by a release from the *Bunker Hill* include very highly utilized recreational beaches in Puget Sound. The area has significant coastlines devoted to state beaches and parks to preserve the natural beauty of the coast. Many areas along the entire potential spill zone are widely popular seaside resorts and support recreational activities such as boating, diving, sightseeing, sailing, fishing, and wildlife viewing.

A release could impact shipping lanes that run through the area of impact into important ports in the Puget Sound and Columbia River, as well as along the Pacific coasts of Washington and Oregon. There are over 3,100 vessel port calls annually with over 210 million tonnage.

Commercial fishing is economically important to the region. Regional commercial landings for 2010 exceeded \$121M. Tribal nations in the area also conduct a significant amount of subsistence fishing in these waters. There are six Tribal Nations with populations of over 19,000 in the area of potential impact.

In addition to the ESI atlases, the Geographic Response Plans within the Area Contingency Plans prepared by the Area Committee for each U.S. Coast Guard Sector have detailed information on important socio-economic resources at risk and should be consulted.

Spill response costs for a release of oil from the *Bunker Hill* would be dependent on volume of oil released and specific areas impacted. The specific shoreline impacts and spread of the oil would determine the response required and the costs for that response.

**Table 4-1:** Socio-economic resources at risk from a release of oil from the *Bunker Hill*.

Resource Type	Resource Name	Economic Activities
<b>Beach Communities</b>	Clallam Bay	Potentially affected beach resorts and beach-front communities in Washington provide recreational activities (e.g., swimming, boating, recreational fishing, wildlife viewing, nature study, sports, dining, camping, and amusement parks) with substantial income for local communities and state tax income.  Many of these recreational activities are limited to or concentrated into the late spring into early fall months.
	Coupeville	
	Dungeness	
	Friday Harbor	
	Gardiner	
	Greenbank	
	Lopez	
	Oak Harbor	
	Port Angeles	
	Port Angeles	
	Port Hadlock	
	Port Stanley	
Port Townsend		
Similk Beach		

Section 4: Socio-Economic Resources at Risk

Resource Type	Resource Name	Economic Activities
<b>National Parks</b>	Olympic National Park	National parks provide recreation for local and tourist populations as well as preserve and protect the nation's natural shoreline treasures
<b>National Wildlife Refuges</b>	Dungeness NWR Protection Island NWR San Juan Islands NWR	National wildlife refuges in Washington may be impacted. These federally-managed and protected lands provide refuges and conservation areas for sensitive species and habitats.
<b>State Parks</b>	Deception Pass State Park Fort Casey State Park Fort Ebey State Park Fort Townsend State Park Fort Worden State Park James Island State Park Jones Island State Park Joseph Whidbey State Park Limekiln State Park Mystery Bay State Park Posey Island State Park Sequim Bay State Park South Whidbey State Park Spencer Spit State Park Stuart Island State Park	Coastal state parks are significant recreational resources for the public (e.g., swimming, boating, recreational fishing, wildlife viewing, nature study, sports, dining, camping, and amusement parks). They provide income to the states. State parks in Washington are potentially impacted.  Many of these recreational activities are limited to or concentrated into the late spring into early fall months.
<b>Tribal Lands</b>	Lower Elwha Klallam Indian Reservation Lummi Indian Reservation Makah Indian Reservation Port Gamble Indian Reservation Swinomish Indian Reservation Tulalip Indian Reservation	The Puget Sound area of Washington includes six Tribal Reservations with over 19,000 members.
<b>Commercial Fishing</b>	A number of fishing fleets use the surrounding waters for commercial fishing purposes.	
	Anacortes-LaConner	Total Landings (2010): \$13.6M
	Bellingham	Total Landings (2010): \$26.9M
	Blaine	Total Landings (2010): \$9.0M
	Neah Bay	Total Landings (2010): \$7.7M
	Olympia	Total Landings (2010): \$16.2M
	Port Townsend	Total Landings (2010): \$4.1M
	Seattle	Total Landings (2010): \$22.1M
	Shelton	Total Landings (2010): \$17.6M
Tacoma	Total Landings (2010): \$3.8M	
<b>Ports</b>	There are a number of significant commercial ports in the Pacific Northwest that could potentially be impacted by spillage and spill response activities. The port call numbers below are for large vessels only. There are many more, smaller vessels (under 400 GRT) that also use these ports.	
	Anacortes, WA	11 port calls annually
	Bellingham, WA	3 port calls annually
	Bremerton, WA	3 port calls annually
	Cherry Point, WA	271 port calls annually
	Everett, WA	81 port calls annually
	Ferndale, WA	101 port calls annually
	Manchester, WA	14 port calls annually
	March Point, WA	188 port calls annually
	Olympia, WA	22 port calls annually

Resource Type	Resource Name	Economic Activities
	Point Wells, WA	14 port calls annually
	Port Angeles, WA	325 port calls annually
	Port Townsend, WA	1 port call annually
	Seattle, WA	1,046 port calls annually
	Tacoma, WA	1,035 port calls annually
	Westport, WA	13 port calls annually

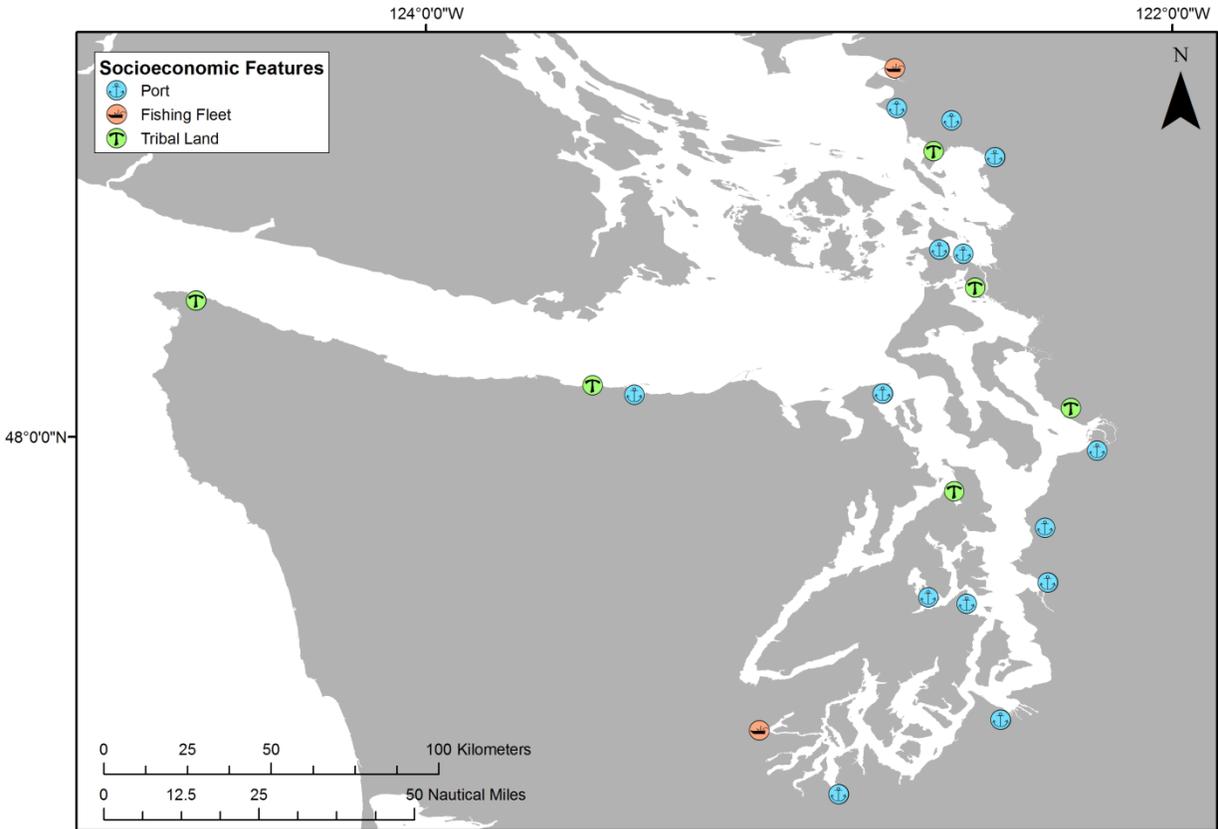


Figure 4-1: Tribal lands, ports and commercial fishing fleets at risk from a release from the *Bunker Hill*.

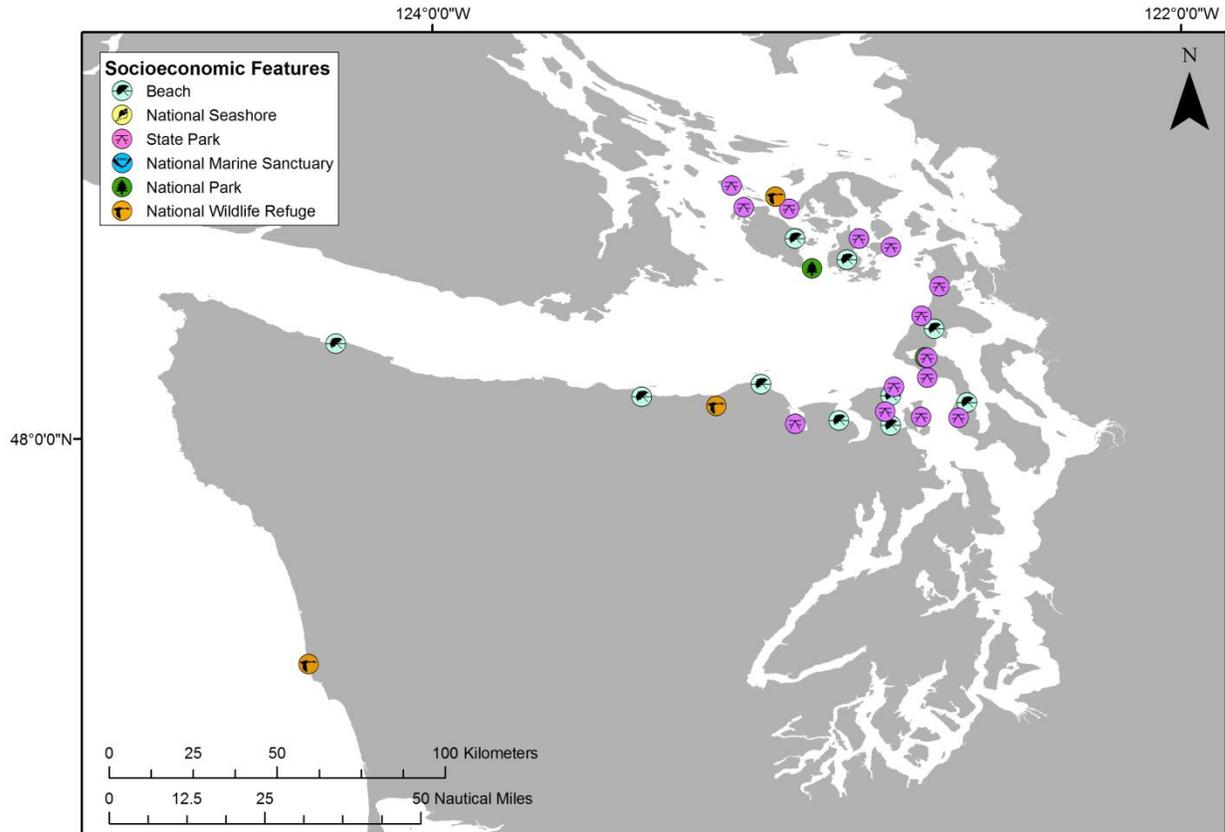


Figure 4-2: Beaches, coastal state parks, and Federal protected areas at risk from a release from the *Bunker Hill*.

## Socio-Economic Risk Factors

### Risk Factor 4: Impacts to Socio-economic Resources at Risk (SRAR)

Socio-economic resources at risk (SRAR) include potentially impacted resources that have some economic value, including commercial and recreational fishing, tourist beaches, private property, etc. All impact factors are evaluated for both the Worst Case and the Most Probable Discharge oil release from the wreck. Risk factors for socio-economic resources at risk are divided into three categories:

- **Water Column:** Impacts to the water column and to economic resources in the water column (i.e., fish and invertebrates that have economic value);
- **Water Surface:** Impacts to the water surface and resources on the water surface (i.e., boating and commercial fishing); and
- **Shoreline:** Impacts to the shoreline and resources on the shoreline (i.e., beaches, real property).

The impacts from an oil release from the wreck would depend greatly on the direction in which the oil slick moves, which would, in turn, depend on wind direction and currents at the time of and after the oil release. Impacts are characterized in the risk analysis based on the likelihood of any measurable impact, as well as the degree of impact that would be expected if there were one. The measure of the degree of impact is based on the median case for which there is at least some impact. The median case is the

“middle case” – half of the cases with significant impacts have less impact than this case, and half have more.

For each of the three socio-economic resources at risk categories, risk is classified with regard to:

- The **probability of oiling** over a certain threshold (i.e., the likelihood that there will be exposure to socio-economic resources over a certain minimal amount known to cause impacts); and
- The **degree of oiling** (the magnitude or amount of that exposure over the threshold known to cause impacts).

As a reminder, the socio-economic impact thresholds are: 1 ppb aromatics for water column impacts; 0.01 g/m<sup>2</sup> for water surface impacts; and 1 g/m<sup>2</sup> for shoreline impacts.

In the following sections, the definition of low, medium, and high for each socio-economic risk factor is provided. Also, in the text classification for the *Bunker Hill* shading indicates the degree of risk for the WCD release of 2,000 bbl and a border indicates degree of risk for the Most Probable Discharge of 200 bbl.

#### Risk Factor 4A-1: Water Column: Probability of Oiling of SRAR

This risk factor reflects the probability that at least 0.2 mi<sup>2</sup> of the upper 33 feet of the water column would be contaminated with a high enough concentration of oil to cause socio-economic impacts. The threshold for water column impact to socio-economic resources at risk is an oil concentration of 1 ppb (i.e., 1 part oil per one billion parts water). At this concentration and above, one would expect impacts and potential tainting to socio-economic resources (e.g., fish and shellfish) in the water column; this concentration is used as a screening threshold for both the ecological and socio-economic risk factors.

The three risk scores for oiling are:

- **Low Oiling Probability:** Probability = <10%
- **Medium Oiling Probability:** Probability = 10 – 50%
- **High Oiling Probability:** Probability > 50%

#### Risk Factor 4A-2: Water Column Degree of Oiling of SRAR

The degree of oiling of the water column reflects the total amount of oil that would affect the water column in the event of a discharge from the vessel. The three categories of impact are:

- **Low Impact:** impact on less than 0.2 mi<sup>2</sup> of the upper 33 feet of the water column at the threshold level
- **Medium Impact:** impact on 0.2 to 200 mi<sup>2</sup> of the upper 33 feet of the water column at the threshold level
- **High Impact:** impact on more than 200 mi<sup>2</sup> of the upper 33 feet of the water column at the threshold level

The *Bunker Hill* is classified as Low Risk for both oiling probability and degree of oiling for water column socio-economic resources for the WCD of 2,000 bbl because 1% of the model runs resulted in contamination of more than 0.2 mi<sup>2</sup> of the upper 33 feet of the water column above the threshold of 1 ppb aromatics, and the mean volume of water contaminated was 0.1 mi<sup>2</sup> of the upper 33 feet of the water

column. For the Most Probable Discharge of 200 bbl, the *Bunker Hill* is classified as Low Risk for oiling probability for water column socio-economic resources because 0% of the model runs resulted in contamination of more than 0.2 mi<sup>2</sup> of the upper 33 feet of the water column above the threshold of 1 ppb aromatics. It is classified as Low Risk for degree of oiling because the mean volume of water contaminated was 0 mi<sup>2</sup> of the upper 33 feet of the water column.

#### **Risk Factor 4B-1: Water Surface Probability of Oiling of SRAR**

This risk factor reflects the probability that at least 1,000 mi<sup>2</sup> of the water surface would be affected by enough oil to cause impacts to socio-economic resources. The three risk scores for oiling are:

- **Low Oiling Probability:** Probability = <10%
- **Medium Oiling Probability:** Probability = 10 – 50%
- **High Oiling Probability:** Probability > 50%

The threshold level for water surface impacts to socio-economic resources at risk is 0.01 g/m<sup>2</sup> (i.e., 0.01 grams of floating oil per square meter of water surface). At this concentration and above, one would expect impacts to socio-economic resources on the water surface.

#### **Risk Factor 4B-2: Water Surface Degree of Oiling of SRAR**

The degree of oiling of the water surface reflects the total amount of oil that would affect the water surface in the event of a discharge from the vessel. The three categories of impact are:

- **Low Impact:** less than 1,000 mi<sup>2</sup> of water surface impact at the threshold level
- **Medium Impact:** 1,000 to 10,000 mi<sup>2</sup> of water surface impact at the threshold level
- **High Impact:** more than 10,000 mi<sup>2</sup> of water surface impact at the threshold level

The *Bunker Hill* is classified as Low Risk for both oiling probability and degree of oiling for water surface socio-economic resources for the WCD because 0% of the model runs resulted in at least 1,000 mi<sup>2</sup> of the water surface affected above the threshold of 0.01 g/m<sup>2</sup>, and the mean area of water contaminated was 152 mi<sup>2</sup>. The *Bunker Hill* is classified as Low Risk for both oiling probability and degree of oiling for water surface socio-economic resources for the Most Probable Discharge because 0% of the model runs resulted in at least 1,000 mi<sup>2</sup> of the water surface affected above the threshold of 0.01 g/m<sup>2</sup>, and the mean area of water contaminated was 30 mi<sup>2</sup>.

#### **Risk Factor 4C: Shoreline Impacts to SRAR**

The impacts to different types of shorelines vary based on economic value. In this risk analysis, shorelines have been weighted by their degree of sensitivity to oiling. Sand beaches are the most economically valued shorelines (weighted as “3” in the impact analysis), rocky and gravel shores are moderately valued (weighted as “2”), and wetlands are the least economically valued shorelines (weighted as “1”). Note that these values differ from the ecological values of these three shoreline types.

#### **Risk Factor 4C-1: Shoreline Probability of Oiling of SRAR**

This risk factor reflects the probability that the shoreline would be coated by enough oil to cause impacts to shoreline users. The threshold for impacts to shoreline SRAR is 1 g/m<sup>2</sup> (i.e., 1 gram of oil per square meter of shoreline). The three risk scores for oiling are:

- **Low Oiling Probability:** Probability = <10%
- **Medium Oiling Probability:** Probability = 10 – 50%
- **High Oiling Probability:** Probability > 50%

**Risk Factor 4C-2: Shoreline Degree of Oiling of SRAR**

The degree of oiling of the shoreline reflects the total amount of oil that would affect the shoreline in the event of a discharge from the vessel. The three categories of impact are:

- **Low Impact:** less than 10 miles of shoreline impacted at threshold level
- **Medium Impact:** 10 - 100 miles of shoreline impacted at threshold level
- **High Impact:** more than 100 miles of shoreline impacted at threshold level

The *Bunker Hill* is classified as High Risk for oiling probability for shoreline socio-economic resources for the WCD because 100% of the model runs resulted in shorelines affected above the threshold of 1 g/m<sup>2</sup>. It is classified as Medium Risk for degree of oiling because the mean length of weighted shoreline contaminated was 15 miles. The *Bunker Hill* is classified as High Risk for oiling probability and Low Risk for degree of oiling for shoreline socio-economic resources for the Most Probable Discharge as 100% of the model runs resulted in shorelines affected above the threshold of 1 g/m<sup>2</sup>, and the mean length of weighted shoreline contaminated was 8 miles.

Considering the modeled risk scores and the socio-economic resources at risk, the socio-economic risk from potential releases of the WCD of 2,000 bbl of heavy fuel oil from the *Bunker Hill* is summarized as listed below and indicated in the far-right column in Table 4-2:

- Water column resources – Low, because there would be a very low impact on the water column in important fishing grounds
- Water surface resources – Medium, because there are important subsistence fishing areas of tribal nations that may be impacted. It should be noted that oil on the surface will not be continuous but rather be broken and patchy and in the form of tarballs and streamers
- Shoreline resources – Medium, because although a relatively small area of shoreline may be impacted, there are many high-value socio-economic resources in these areas

**Table 4-2:** Socio-economic risk factor ranks for the **Worst Case Discharge of 2,000 bbl** of heavy fuel oil from the *Bunker Hill*.

Risk Factor	Risk Score			Explanation of Risk Score	Final Score
	Low	Medium	High		
4A-1: Water Column Probability SRAR Oiling	Low	Medium	High	1% of the model runs resulted in at least 0.2 mi <sup>2</sup> of the upper 33 feet of the water column contaminated above 1 ppb aromatics	Low
4A-2: Water Column Degree SRAR Oiling	Low	Medium	High	The mean volume of water contaminated above 1 ppb was 0.1 mi <sup>2</sup> of the upper 33 feet of the water column	
4B-1: Water Surface Probability SRAR Oiling	Low	Medium	High	0% of the model runs resulted in at least 1,000 mi <sup>2</sup> of water surface covered by at least 0.01 g/m <sup>2</sup>	Med
4B-2: Water Surface Degree SRAR Oiling	Low	Medium	High	The mean area of water contaminated above 0.01 g/m <sup>2</sup> was 152 mi <sup>2</sup>	
4C-1: Shoreline Probability SRAR Oiling	Low	Medium	High	100% of the model runs resulted in shoreline oiling of 1 g/m <sup>2</sup>	Med
4C-2: Shoreline Degree SRAR Oiling	Low	Medium	High	The length of shoreline contaminated by at least 1 g/m <sup>2</sup> was 15 mi	

For the Most Probable Discharge of 200 bbl, the socio-economic risk from potential releases of heavy fuel oil from the *Bunker Hill* is summarized as listed below and indicated in the far-right column in Table 4-3:

- Water column resources – Low, because there would be a virtually no impact on the water column in important fishing grounds
- Water surface resources – Low, because there would be a relatively small area of impact on the water surface in areas of shipping lanes and important subsistence fishing areas of tribal nations. It should be noted that oil on the surface will not be continuous but rather be broken and patchy and in the form of tarballs and streamers
- Shoreline resources – Medium, because although a relatively small area of shoreline may be impacted it has many high-value socio-economic resources

**Table 4-3:** Socio-economic risk factor ranks for the **Most Probable Discharge of 200 bbl** of heavy fuel oil from the *Bunker Hill*.

Risk Factor	Risk Score			Explanation of Risk Score	Final Score
	Low	Medium	High		
4A-1: Water Column Probability SRAR Oiling	Low	Medium	High	0% of the model runs resulted in at least 0.2 mi <sup>2</sup> of the upper 33 feet of the water column contaminated above 1 ppb aromatics	Low
4A-2: Water Column Degree SRAR Oiling	Low	Medium	High	The mean volume of water contaminated above 1 ppb was 0 mi <sup>2</sup> of the upper 33 feet of the water column	
4B-1: Water Surface Probability SRAR Oiling	Low	Medium	High	0% of the model runs resulted in at least 1,000 mi <sup>2</sup> of water surface covered by at least 0.01 g/m <sup>2</sup>	Low
4B-2: Water Surface Degree SRAR Oiling	Low	Medium	High	The mean area of water contaminated above 0.01 g/m <sup>2</sup> was 30 mi <sup>2</sup>	
4C-1: Shoreline Probability SRAR Oiling	Low	Medium	High	100% of the model runs resulted in shoreline oiling of 1 g/m <sup>2</sup>	Med
4C-2: Shoreline Degree SRAR Oiling	Low	Medium	High	The length of shoreline contaminated by at least 1 g/m <sup>2</sup> was 8 mi	

## SECTION 5: OVERALL RISK ASSESSMENT AND RECOMMENDATIONS FOR ASSESSMENT, MONITORING, OR REMEDIATION

The overall risk assessment for the *Bunker Hill* is comprised of a compilation of several components that reflect the best available knowledge about this particular site. Those components are reflected in the previous sections of this document and are:

- Vessel casualty information and how the site formation processes have worked on this vessel
- Ecological resources at risk
- Socio-economic resources at risk
- Other complicating factors (war graves, other hazardous cargo, etc.)

Table 5-1 summarizes the screening-level risk assessment scores for the different risk factors, as discussed in the previous sections. The ecological and socio-economic risk factors are presented as a single score for water column, water surface, and shoreline resources as the scores were consolidated for each element. For the ecological and socio-economic risk factors each has two components, probability and degree. Of those two, degree is given more weight in deciding the combined score for an individual factor, e.g., a high probability and medium degree score would result in a medium overall for that factor.

In order to make the scoring more uniform and replicable between wrecks, a value was assigned to each of the 7 criteria. This assessment has a total of 7 criteria (based on table 5-1) with 3 possible scores for each criteria (L, M, H). Each was assigned a point value of L=1, M=2, H=3. The total possible score is 21 points, and the minimum score is 7. The resulting category summaries are:

Low Priority	7-11
Medium Priority	12-14
High Priority	15-21

For the Worst Case Discharge, *Bunker Hill* scores Low with 11 points; for the Most Probable Discharge, *Bunker Hill* also scores Low with 9 points. Under the National Contingency Plan, the U.S. Coast Guard and the Regional Response Team have the primary authority and responsibility to plan, prepare for, and respond to oil spills in U.S. waters. Based on the technical review of available information, NOAA proposes the following recommendations for the *Bunker Hill*. The final determination of what type of action, if any, rests with the U.S. Coast Guard.

<i>Bunker Hill</i>	Possible NOAA Recommendations
	Wreck should be considered for further assessment to determine the vessel condition, amount of oil onboard, and feasibility of oil removal action
	Location is unknown; Use surveys of opportunity to attempt to locate this vessel and gather more information on the vessel condition
	Conduct active monitoring to look for releases or changes in rates of releases
✓	Be noted in the Area Contingency Plans so that if a mystery spill is reported in the general area, this vessel could be investigated as a source
✓	Conduct outreach efforts with the technical and recreational dive community as well as commercial and recreational fishermen who frequent the area, to gain awareness of changes in the site

**Table 5-1:** Summary of risk factors for the *Bunker Hill*.

Vessel Risk Factors		Data Quality Score	Comments	Risk Score	
Pollution Potential Factors	A1: Oil Volume (total bbl)	Medium	Maximum of 1,713 bbl, not reported to be leaking	Med	
	A2: Oil Type	High	Cargo is heavy fuel oil, a Group IV oil type		
	B: Wreck Clearance	High	Vessel not reported as cleared		
	C1: Burning of the Ship	High	Fire and explosion was reported		
	C2: Oil on Water	High	Oil was reported on the water, amount is not known		
	D1: Nature of Casualty	High	Severe explosion		
	D2: Structural Breakup	High	The vessel broke in two at the time of sinking		
Archaeological Assessment	Archaeological Assessment	Low	The best sinking assessment is from the U.S. Coast Guard; a detailed archaeological assessment was not prepared	Not Scored	
Operational Factors	Wreck Orientation	High	The wreck is resting on its side	Not Scored	
	Depth	Low	The wreck is 280 feet deep		
	Visual or Remote Sensing Confirmation of Site Condition	High	The wreck is a technical diving site		
	Other Hazardous Materials Onboard	High	No		
	Munitions Onboard	High	No		
	Gravesite (Civilian/Military)	High	Yes		
	Historical Protection Eligibility (NHPA/SMCA)	High	Unknown, full National Register of Historic Places assessment should be conducted		
				WCD	Most Probable
Ecological Resources	3A: Water Column Resources	High	Very low probabilities and volumes of water column impacts likely	Low	Low
	3B: Water Surface Resources	High	Small area of exposure above thresholds, though there are large numbers of birds and marine mammals at risk	Med	Low
	3C: Shore Resources	High	Few miles of shoreline impact likely, and mostly gravel beaches	Low	Low
Socio-Economic Resources	4A: Water Column Resources	High	Very low impact on the water column in important fishing grounds	Low	Low
	4B: Water Surface Resources	High	Although there would be a relatively small area of impact in areas of shipping lanes, there are important subsistence fishing areas of tribal nations that may be impacted	Med	Low
	4C: Shore Resources	High	Although a relatively small area of shoreline may be impacted, it has many high-value socio-economic resources	Med	Med
<b>Summary Risk Scores</b>				<b>11</b>	<b>9</b>