8.0 MITIGATION MONITORING PROGRAM

As the Lead Agency under the California Environmental Quality Act (CEQA), the California State Lands Commission (CSLC) is required to adopt a program for reporting or monitoring regarding the implementation of mitigation measures for the Amorco Marine Oil Terminal Lease Consideration Project, if it is approved, to ensure that the adopted mitigation measures are implemented as defined in this Environmental Impact Report (EIR). This Lead Agency responsibility originates in Public Resources Code section 21081.6, subdivision (a) (Findings), and the State Guidelines for Implementing CEQA sections 15091, subdivision (d) (Findings) and 15097 (Mitigation Monitoring or Reporting).

8.1 MONITORING AUTHORITY

The purpose of a Mitigation Monitoring Program (MMP) is to ensure that measures adopted to mitigate or avoid significant impacts are implemented. A MMP can be a working guide to facilitate not only the implementation of mitigation measures by the Project proponent, but also the monitoring, compliance and reporting activities of the CSLC and any monitors it may designate.

The CSLC may delegate duties and responsibilities for monitoring to other environmental monitors or consultants as deemed necessary, and some monitoring responsibilities may be assumed by responsible agencies, such as affected jurisdictions and cities, and the California Department of Fish and Wildlife (CDFW). The number of construction monitors assigned to the project will depend on the number of concurrent construction activities and their locations. The CSLC or its designee(s), however, will ensure that each person delegated any duties or responsibilities is qualified to monitor compliance.

Any mitigation measure study or plan that requires the approval of the CSLC must allow at least 60 days for adequate review time. When a mitigation measure requires that a mitigation program be developed during the design phase of the project, the Applicant must submit the final program to the CSLC for review and approval at least 60 days before construction begins. Other agencies and jurisdictions may require additional review time. It is the responsibility of the environmental monitor assigned to the installation or implementation of the project or a project component (e.g., a pipeline “spread” [the equipment and crew needed to build a section of pipeline]) to ensure that appropriate agency reviews and approvals are obtained.

The CSLC or its designee will also ensure that any deviation from the procedures identified under the monitoring program is approved by the CSLC. Any deviation and its correction shall be reported immediately to the CSLC or its designee by the environmental monitor.

8.2 ENFORCEMENT RESPONSIBILITY

The CSLC, as the lead agency, is responsible for enforcing the procedures adopted for monitoring through the environmental monitor. Any assigned environmental monitor shall note problems with monitoring, notify appropriate agencies or individuals about any problems, and report the problems to the CSLC or its designee.

8.3 MITIGATION COMPLIANCE RESPONSIBILITY

Tesoro is responsible for successfully implementing all the mitigation measures in the MMP, and shall ensure that these requirements are met by all of its construction contractors and field personnel. Standards for successful mitigation also are implicit in many mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Other mitigation measures include detailed success criteria. Additional mitigation success thresholds may be established by applicable agencies with jurisdiction through the permit process and through the review and approval of specific plans for the implementation of mitigation measures.

8.4 GENERAL MONITORING PROCEDURES

Environmental Monitors. Many of the monitoring procedures will be conducted during the construction phase of the project, if there is a construction phase. The CSLC and the environmental monitor(s) are responsible for integrating the mitigation monitoring procedures into the construction process in coordination with the Applicant. To oversee the monitoring procedures and to ensure success, the environmental monitor must be on site during that portion of construction that has the potential to create a significant environmental impact or other impact for which mitigation is required. The environmental monitor is responsible for ensuring that all procedures specified in the monitoring program are followed.

General Reporting Procedures. Site visits and specified monitoring procedures performed by other individuals will be reported to the environmental monitor. A monitoring record form will be submitted to the environmental monitor by the individual conducting the visit or procedure so that details of the visit can be recorded and progress tracked by the environmental monitor. A checklist will be developed and maintained by the environmental monitor to track all procedures required for each mitigation measure and to ensure that the timing specified for the procedures is adhered to. The environmental monitor will note any problems that may occur and take appropriate action to rectify the problems.

Public Access to Records. The public is allowed access to records and reports used to track the monitoring program. Monitoring records and reports will be made available for public inspection by the CSLC or its designee on request.

8.5 MITIGATION MONITORING TABLES

This section presents mitigation monitoring tables (Tables 8-1 through 8-5) for the following environmental disciplines: Operational Safety/Risk of Accidents; Biological Resources; Water Quality; Land Use and Recreation; and Visual Resources, Light and Glare. All other environmental disciplines were found to have less than significant or no impacts and are therefore not included below. Each table lists the following information, by column:

- Impact (impact number, title, and impact class);
- Mitigation Measure (full text of the measure);
- Location (where the impact occurs and the mitigation measure should be applied);
- Monitoring/reporting action (the action to be taken by the monitor or Lead Agency);
- Effectiveness criteria (how the agency can know if the measure is effective);
- Responsible agency; and
- Timing (before, during, or after construction; during operation, etc.).

Table 8-1: Mitigation Monitoring – Operational Safety/Risk of Accidents

Impact (Class)	Mitigation Measure(s) (MMs)	Monitoring/ Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
OS-1: Potential for spills and response capability for containment of oil spills from the Amorco Terminal during transfer operations. (Significant and unavoidable.)	MM OS-1a: Provide and maintain mooring line quick release devices that shall be able to be activated within 60 seconds. • These devices shall be capable of being engaged by electric/push button release mechanism and by integrated remotely-operated release system. • Tesoro shall document procedures and training for systems use and communications between Amorco Terminal and vessel operator(s). • Routine inspection, testing and maintenance of all equipment and systems in accordance with manufacturers' recommendations and necessity are required to ensure safety and reliability, to the satisfaction of CSLC staff. • Tesoro may install alternate technology that provides an equivalent level of protection, as reviewed by CSLC staff and approved by the Commission at a publicly noticed meeting.	CSLC monitor to observe properly provided and maintained devices and periodically monitor procedures and training for systems use.	This measure would allow a vessel to leave the Amorco Terminal as quickly as possible in the event of an emergency (fire, explosion, accident, or tsunami that could lead to a spill) that could impact the Amorco Terminal or the vessel.	CSLC	Within 24 months of lease implementation
	MM OS-1b: Tension Monitoring Systems. Provide and maintain TMSs to effectively monitor all mooring line and environmental loads, and avoid excessive tension or slack line conditions that could result in damage to the terminal structure and/or equipment and/or vessel mooring line failures that could result in spills. • Line tensions and environmental data shall be integrated into systems that record and relay all critical data in real time to the control room, terminal operator(s) and vessel operator(s).	CSLC monitor to observe properly provided and maintained devices and periodically monitor procedures and training for systems use.	Reduces potential for damages and spills.	CSLC	Within 24 months of lease implementation

Impact (Class)	Mitigation Measure(s) (MMs)	Monitoring/ Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	• This system shall include, but not be limited to, quick release hooks only (with load cells), site-specific current meter(s), site-specific anemometer(s), and visual and audible alarms that can support effective preset limits and shall be able to record and store monitoring data. • Tesoro shall document procedures and training for systems use and communications between Amorco Terminal and vessel operator(s) • Routine inspection, testing and maintenance of all equipment and systems in accordance with manufacturers' recommendations and necessity are required to ensure safety and reliability, to the satisfaction of CSLC staff. • Tesoro may install alternate technology that provides an equivalent level of protection, as reviewed by CSLC staff and approved by the Commission at a publicly noticed meeting.				
	MM OS-1c: Allision Avoidance Systems. Provide and maintain AASs at the Amorco MOT to prevent damage to the pier/wharf and/or vessel during docking and berthing operations. • The AASs shall be used and alarmed to monitor vessel drift (both surge and sway) during all mooring operations, and shall be equipped with an AIS receiver to capture passing vessel parameters. • This shall be integrated with the TMSs such that all data collected are available in the Control Room and to Amorco Terminal operator(s) at all times and vessel operator(s) during berthing operations. The AASs shall	CSLC monitor to observe properly, provided, and maintained devices and periodically monitor procedures and training for systems use.	Reduces potential for damages and spills.	CSLC	Within 24 months of lease implementation

Impact (Class)	Mitigation Measure(s) (MMs)	Monitoring/ Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	also be able to record and store monitoring data. • Tesoro shall document procedures and training for systems use and communications between Amorco Terminal and vessel operator(s). • Routine inspection, testing and maintenance of all equipment and systems in accordance with manufacturers' recommendations and necessity are required to ensure safety and reliability, to the satisfaction of CSLC staff.				
OS-2: Amorco Terminal spills from pipelines during non-transfer periods. (Significant and unavoidable.)	No additional mitigation measures available. (See MM OS-1a, OS-1b, OS1c, OS4a, and OS-4b.)	See MM OS-1a, OS-1b, OS1c, OS4a, and OS-4b.	See MM OS-1a, OS-1b, OS1c, OS4a, and OS-4b.	See MM OS-1a, OS-1b, OS1c, OS4a, and OS-4b.	See MM OS-1a, OS-1b, OS1c, OS4a, and OS-4b.
OS-3: Potential for fires and explosions and response capability. (Significant and unavoidable.)	MM OS-3b: Fire Protection Assessment. Tesoro shall develop a Fire Protection Assessment, including a set of procedures, training and drills consistent with Marine Oil Terminal Engineering and Maintenance Standards (Cal. Code Regs., tit. 24, §3108F2.2). Tesoro shall also develop a set of procedures and conduct training and drills for dealing with tank vessel fires and explosions for tank vessels berthed at the terminal. The procedures shall include the steps to follow in the event of a tank vessel fire and describe how Tesoro and the vessel will coordinate activities. The procedures shall also identify other capabilities that can be procured if necessary in the event of a major incident. The Fire Plan and procedures shall be submitted to the California State Lands Commission (CSLC) staff within 90 days of lease renewal. The CSLC staff shall have final approval of the plan.	Tesoro shall prepare and submit Fire Protection Assessment to CSLC for review and approval.	Provides planning and procedures for emergency response.	CSLC	Submit to CSLC within 90 days of signing the lease agreement.

Impact (Class)	Mitigation Measure(s) (MMs)	Monitoring/ Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
OS-4: Response capability for accidents in the Bay and outer coast.	MM OS-4a: U.S. Coast Guard (USCG) Ports and Waterways Safety Assessment workshops. Tesoro shall participate in USCG PAWSA workshops for the San Francisco Bay Area to support overall safety improvements to the existing Vessel Traffic Service in the Bay Area or approaches to the Bay, if such workshops are conducted by the USCG during the life of the lease.	Tesoro shall demonstrate to CSLC their participation in USCG PAWSA workshops to support overall safety in the Bay and to protect sensitive resources.	Reduces potential damage to resources.	CSLC	Life of lease.
	MM OS-4b: Spill response to vessel spills. Tesoro shall respond to any spill from a vessel traveling in the San Francisco Bay to or from the Amorco Terminal or moored at the Amorco Terminal , as if it were its own, without assuming liability, until such time as the vessel's response organization can take over management of the response actions in a coordinated manner.	CSLC monitor to observe emergency actions.	Reduces potential damage to resources.	CSLC	Life of lease.

Table 8-2: Mitigation Monitoring – Biological Resources

Impact (Class)	Mitigation Measure(s) (MMs)	Monitoring/Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
BIO-6: Cause impacts to the San Francisco Bay Estuary and associated aquatic biota as a result of major fuel, lubricant, and/or boat-related spills. (Significant and unavoidable.)	MM BIO-6a: Bird rescue personnel and rehabilitators. Tesoro shall ensure that procedures are in place to bring bird rescue personnel and rehabilitators to the site following a spill event that is not immediately contained at the Amorco Terminal. This requires having contractual arrangements in place as part of the Golden Eagle Refinery Oil Spill Contingency Plan so that bird rescue personnel and equipment can be on-site within hours of the onset of an accidental release.	Verify contractual arrangements in place and contact info on site	Minimize marine bird mortality in the event of a spill.	CSLC	Within 60 days of project approval and EIR certification and for life of lease.

Impact (Class)	Mitigation Measure(s) (MMs)	Monitoring/Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	MM BIO-6b: Cleanup of oil from biological area. When a spill occurs, Tesoro shall develop procedures for cleanup of any sensitive biological areas contacted by oil in consultation with biologists from the CDFW, National Marine Fisheries Service (NMFS), and U.S. Fish and Wildlife Service (USFWS).	Verify that cleanup procedures have been developed.	Minimize impacts to sensitive biological areas in the event of a spill.	CSLC, with CDFW, U.S. USFWS, and NMFS	Within 60 days of project approval and EIR certification and for life of lease.
	MM BIO-6c: Natural Resource Damage Assessment (NRDA) Team. Tesoro shall coordinate to the maximum extent feasible with the NRDA Team to determine the extent of damage and loss of resources, cleanup, restoration, and compensation. Tesoro shall keep the CSLC staff informed of its participation in such efforts by providing copies of memos, meeting agendas, emails, or other appropriate documentation. Tesoro shall be responsible for cleanup, restoration, and compensation of damages to resources if Tesoro is determined to be the responsible party for a spill.	Tesoro shall provide documentation of participation to CSLC staff.	Reduces potential damage and loss of resources from oil spill.	CSLC, NRDA trustee agencies (typically USFWS, NMFS, CSLC, CDFW)	In conjunction with NRDA, for life of lease.
BIO-7: Introduce invasive nonindigenous species to the San Francisco Bay Estuary. (Significant and unavoidable.)	MM BIO-7a: Marine Invasive Species Act (MISA) Reporting Forms. Tesoro shall advise both agents and representatives of shipping companies having control over vessels that have informed Tesoro of plans to call at the Amorco Terminal about the California Marine Invasive Species Act and associated implementing regulations. Tesoro shall satisfy itself that all vessels submit required reporting forms, as applicable for each vessel, to the CSLC Marine Facilities Division, including, but not limited to, the Ballast Water Reporting Form, Hull Husbandry Reporting Form, Ballast Water Treatment Technology Reporting Form, and/or Ballast Water Treatment Supplemental Reporting Form.	Verify documentation of vessel compliance with reporting requirements and associated regulation.	Compliance with MISA to reduce the introduction of nonindigenous aquatic species from ballast water and hull fouling.	CSLC	Life of lease.
	MM BIO-7b: Invasive species action funding. Tesoro shall participate and assist in funding ongoing and future actions related to nonindigenous aquatic species	The level of funding shall be determined by the CSLC, DWR,	Contributions will go towards effort in finding a solution to	CSLC, DWR, CDFW	Life of lease.

Impact (Class)	Mitigation Measure(s) (MMs)	Monitoring/Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	as identified in the October 2005 Delta Smelt Action Plan (State of California 2005). The funding support shall be provided to the Pelagic Organism Decline Account or other account identified by the California Department of Water Resources (DWR) and CDFW, the lead Action Plan agencies. The level of funding shall be determined through a cooperative effort between the CSLC, DWR, CDFW, and Tesoro, and shall be based on criteria that establish Tesoro's commensurate share of the plan's nonindigenous aquatic species actions costs.	CDFW, and Tesoro as part of the agencies' responsibilities under the Delta Smelt Action Plan and CSLC's administration of MISA.	pelagic species decline.		
CUM-BIO-2: Cause cumulative impacts to San Francisco Bay Estuary and associated biota from oil spills from all marine oil terminals combined, or from all tankering combined. (Significant and unavoidable.)	MM CUM-BIO-2a: Tesoro shall implement MM BIO-6a through BIO-6c.	See MM BIO-6a through BIO-6c.	See MM BIO-6a through BIO-6c.	See MM BIO-6a through BIO-6c.	See MM BIO-6a through BIO-6c.
CUM-BIO-3: Cause cumulative impacts by increasing the risk of introduction of nonindigenous aquatic species from vessel traffic to San Francisco Bay. (Significant and unavoidable.)	MM CUM-BIO-3a: Tesoro shall implement MM BIO-7a and BIO-7b.	See MM BIO-7a and BIO-7b.	See MM BIO-7a and BIO-7b.	See MM BIO-7a and BIO-7b.	See MM BIO-7a and BIO-7b.

Table 8-3: Mitigation Monitoring – Water Quality

Impact (Class)	Mitigation Measure(s) (MMs)	Monitoring/Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
WQ-3: Degrade water quality by the discharge of ballast water. (Significant and unavoidable.)	MM WQ-3: Advise vessels of applicable regulations and standards. Tesoro shall advise both agents and representatives of shipping companies having control over vessels that have informed Tesoro of plans to call at the Amorco Terminal about the Coastal Ecosystems	Tesoro will advise both agents and representatives of shipping companies having control over	Informing vessel operators of regulations and standards will help reduce the potential	CSLC, U.S. Gulf Coast, U.S. Environmental	Prior to the vessel's entry into San Francisco

Impact (Class)	Mitigation Measure(s) (MMs)	Monitoring/Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	Protection Act of 2006 and associated implementing regulations.	vessels that have informed Tesoro of plans to call at the Amorco Terminal about the Coastal Ecosystems Protection Act of 2006 and associated implementing regulations.	of nonindigenous aquatic species introduction via ballast water.	Protection Agency	Bay or in the alternative, at least 24 hours prior to the vessel's arrival at the Amorco Terminal.
WQ-5: Degrade water quality as a result of vessel biofouling. (Significant and unavoidable.)	MM WQ-5: Advise vessels of applicable regulations and standards. Tesoro shall prepare, and maintain current, a fact sheet and provide it to all vessels calling at the Amorco Terminal to ensure that they are informed of applicable regulations and standards associated with the prevention of biofouling. Prior to allowing berthing at the Terminal, Tesoro will confirm with vessels that they are in compliance with the Marine Invasive Species Act (MISA), including completion of MISA-required paperwork. Tesoro shall ensure that all vessels submit required reporting forms, as applicable for each vessel prior to the vessel's entry into San Francisco Bay or in the alternative, at least 24 hours prior to the vessel's arrival at the Amorco Terminal.	Tesoro shall prepare, and maintain current, a fact sheet and provide it to all vessels calling at the Amorco Terminal to ensure that they are informed of applicable regulations and standards associated with the prevention of biofouling. Tesoro would confirm with vessels that they are in compliance with MISA, including completion of MISA-required paperwork.	Informing vessel operators of regulations and standards will help reduce the risk of the risk of nonindigenous aquatic species introductions through vessel biofouling. Data collected from the MISA reporting forms will aid research in preventing biofouling.	CSLC	Prior to the vessel's entry into San Francisco Bay or in the alternative, at least 24 hours prior to the vessel's arrival at the Amorco Terminal.
WQ-6: Degrade water quality due to anti-fouling paints used on vessel hulls. (Significant and unavoidable.)	WQ-6 Inform Vessels calling at the Amorco Terminal of the ban on tributyltin (TBT). Tesoro shall prepare, and maintain current, a fact sheet and provide it to all vessels calling at the Amorco Terminal to ensure that they are informed of the requirements of the 2008 International Maritime Organization prohibition of TBT applications to vessel hulls. Prior to allowing berthing at the Terminal, Tesoro will confirm with vessels that they	Tesoro shall Inform vessels calling at the Amorco Terminal of the ban on TBT. Tesoro will advise both agents and representatives of shipping companies	Informing vessel operators of the ban on TBT will help reduce the impact to water quality from highly harmful antifouling.	CSLC	Prior to the vessel's entry into San Francisco Bay or in the alternative, at least 24

Impact (Class)	Mitigation Measure(s) (MMs)	Monitoring/Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
	are in compliance with the Marine Invasive Species Act (MISA), including completion of MISA-required paperwork. Tesoro shall ensure that all vessels submit required reporting forms, as applicable for each vessel prior to the vessel's entry into San Francisco Bay or in the alternative, at least 24 hours prior to the vessel's arrival at the Amorco Terminal.	about the requirements of the 2008 International Maritime Organization prohibition of TBT applications to vessel hulls.			hours prior to the vessel's arrival at the Amorco Terminal.
WQ-8: Degrade water quality as a result of stormwater runoff from the wharf. (Potentially significant.)	WQ-8: Amend existing Storm Water Pollution Prevention Plan (SWPPP). Tesoro shall append the existing SWPPP to include specific Best Management Practices (BMPs) to protect stormwater runoff from the wharf area. BMPs shall be designed to reduce the input of contaminant to the San Francisco Bay and prevent leaks and spills during routine activities.	Tesoro shall append the existing SWPPP to include specific Best Management Practices (BMPs) to protect stormwater runoff from the wharf area.	Amended Plan will prevent releases of contaminants from the wharf to nearby waterways.	CSLC	Prior to implementation of Project activities.
WQ-9: Degrade water quality as a result of oil leaks and spills during unloading. (Significant and unavoidable.)	No additional mitigation measures available. (See MMs OS-1a, 1b, and 1c.)	See MMs OS-1a, 1b, and 1c.	See MMs OS-1a, 1b, and 1c.	See MMs OS-1a, 1b, and 1c.	See MMs OS-1a, 1b, and 1c.
WQ-10: Degrade water quality due to releases from vessels in transit in the San Francisco Bay or along the outer coast. (Significant and unavoidable.)	No additional mitigation measures available. (See MMs OS-4a and OS-4b.)	See MMs OS-1a, 1b, and 1c.	See MMs OS-1a, 1b, and 1c.	See MMs OS-1a, 1b, and 1c.	See MMs OS-1a, 1b, and 1c.
CUM WQ-1: Cause contaminant impacts on San Francisco Bay water quality. (Significant and unavoidable.)	No additional mitigation measures available. (See MMs WQ-3, WQ-5 and WQ-6.)	See MMs WQ-3, WQ-5 and WQ-6.	See MMs WQ-3, WQ-5 and WQ-6.	See MMs WQ-3, WQ-5 and WQ-6.	See MMs WQ-3, WQ-5 and WQ-6.
CUM WQ-3: Degrade water quality due to oil releases from vessels in transit in the San Francisco Bay or along the outer coast. (Significant and unavoidable.)	No additional mitigation measures available. (See MMs OS-1a, 1b, and 1c.)	See MMs OS-1a, 1b, and 1c.	See MMs OS-1a, 1b, and 1c.	See MMs OS-1a, 1b, and 1c.	See MMs OS-1a, 1b, and 1c.

Table 8-4: Mitigation Monitoring – Land Use and Recreation

Impact (Class)	Mitigation Measure(s) (MMs)	Monitoring/Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
LUR-2: Cause residual impacts on sensitive shoreline lands and/or water and non-water recreation due to an accidental release of oil at or near the Amorco Terminal. (Significant and unavoidable.)	No additional mitigation measures available. (See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.)	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.
LUR-3: Cause residual impacts on sensitive shoreline lands and/or water and non-water recreation due to an accidental release of oil from vessels in transit. (Significant and unavoidable.)	No additional mitigation measures available. (See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.)	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.

Table 8-5: Mitigation Monitoring – Visual Resources, Light and Glare

Impact (Class)	Mitigation Measure(s) (MMs)	Monitoring/Reporting Action	Effectiveness Criteria	Responsible Agency	Timing
VR-4: Create visual effects from accidental releases of oil at or near the Amorco Terminal. (Significant and unavoidable.)	No additional mitigation measures available. (See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.)	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.
VR-5: Create visual effects from oil spills from vessels in transit. (Significant and unavoidable.)	No additional mitigation measures available. (See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.)	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.	See MMs OS-1a, OS-1b, OS-1c, OS-4a, and OS-4b.