

U.S. Department
of Transportation

United States
Coast Guard



Commandant
U.S. Coast Guard

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Washington, DC 20593-0001
Staff Symbol: G-MKP
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DEC 27 1994

Mr. Pete Sarnacki
JBF Scientific Company, Inc.
Clark Point Road
Southwest Harbor
Maine 04679

Dear Mr. Sarnacki:

We have reviewed the information provided in your letters of September 1 and 27, 1994, regarding your request for an alternative efficiency rating for JBF DIP skimmers. The Code of Federal Regulations (33 CFR 155, Appendix B, Section 6) provides for the determination of efficiency factors for oil spill recovery devices as alternatives to the regulatory derating factor of 20% of manufacturer's rated capacity. The alternative means identified in Section 6 include testing in accordance with ASTM Standard F-631, F-808, or an equivalent test approved by the Coast Guard.

Your request for alternative efficiency ratings was based upon actual test results acquired during 1976 OHMSETT testing of the DIP 3001. The Coast Guard neither certifies the applicability of the test results to all conditions nor recommends that OSROs or vessel or facility owners or operators accept them as proof of demonstrated recovery efficiency under all conditions. In calculating effective daily recovery capacity (EDRC) you, your customers, and response plan holders should also consider the very real limitations imposed by other variables such as weather, darkness, and particularly encounter rate, that are not reflected in the test results.

The US Navy report entitled USN DIP 3001 PERFORMANCE TEST PROGRAM summarizes the test results acquired at OHMSETT. Tested throughput efficiencies (oil collected/oil encountered X 100) in calm water averaged 80% at 2.5 knots and 94% at 1 knot. In moderately choppy water (.46 m to .76 m) efficiencies ranged from 74% at 2 knots to 84% at 1 knot. You and your customers may use these alternative ratings to calculate EDRC for response conditions similar to the test conditions.

Your letter requests alternative efficiency ratings for several JBF Skimmer models based on the testing results for DIP 3001. You may consider calm water performance to be directly scalable for all, operationally similar JBF DIP model skimmers. For applications in other than calm waters, however, you may apply these ratings to those operationally similar models whose

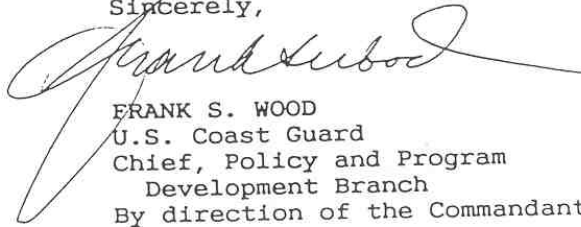
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Subj: ALTERNATIVE RATING FACTORS FOR JBF DYNAMIC
INCLINED PLANE (DIP) SKIMMERS

seakeeping characteristics either meet or exceed those of the DIP
3001.

Thank you for your continued interest in and commitment to marine
environmental protection.

Sincerely,

A handwritten signature in cursive script, appearing to read "Frank S. Wood". The signature is written in dark ink and is positioned above the typed name and title.

FRANK S. WOOD
U.S. Coast Guard
Chief, Policy and Program
Development Branch
By direction of the Commandant