

Screening Level Risk Assessment Package

Gulfpenn



ENVIRONMENTAL
RESEARCH
CONSULTING

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Photo: Photograph of *Gulfpenn*
Source: <http://www.uboot.net/allies/merchants/ships/1645.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.

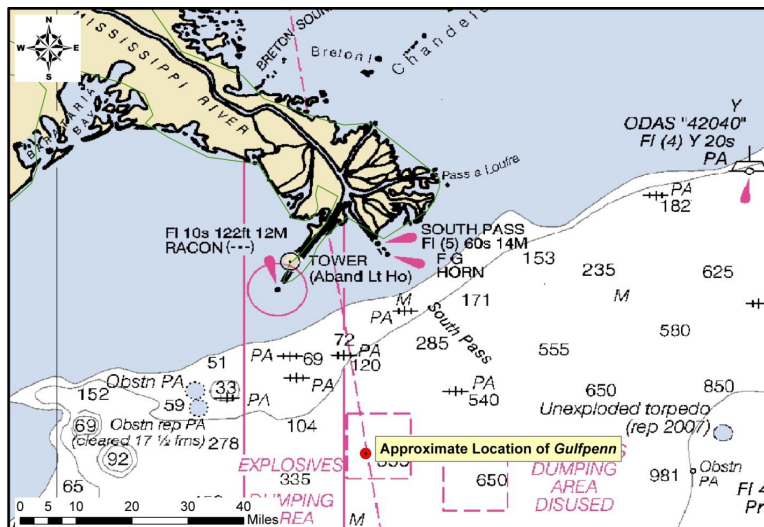
The potential polluting shipwrecks were identified through searching a broad variety of historical sources. NOAA then worked with Research Planning, Inc., RPS ASA, and Environmental Research Consulting to conduct the modeling forecasts, and the ecological and environmental resources at risk assessments.

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: *Gulfpenn*

The tanker *Gulfpenn*, torpedoed and sunk during World War II off the mouth of the Mississippi River in 1942, 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 *Gulfpenn*, 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, *Gulfpenn* scores Medium with 12 points; for the Most Probable Discharge (10% of the Worst Case volume), *Gulfpenn* scores Low with 10 points. Given these scores, and higher level of data certainty, NOAA recommends that archaeologists with BOEM and BSEE should be contacted for more information based on their surveys of the wreck site. General notations should be made 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. Outreach efforts with commercial fishermen who might frequent the area, would be helpful to gain awareness of localized spills and any changes in 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		
Archaeological Assessment	D2: Structural Breakup	Not Scored	
	Archaeological Assessment		
Operational Factors	Wreck Orientation	Not Scored	
	Depth		
	Confirmation of Site Condition		
	Other Hazardous Materials		
	Munitions Onboard		
	Gravesite (Civilian/Military)		
Ecological Resources	Historical Protection Eligibility	WCD MP (10%)	
Socio-Economic Resources	3A: Water Column Resources	Low	Low
	3B: Water Surface Resources	Med	Med
	3C: Shore Resources	Med	Low
Summary Risk Scores	4A: Water Column Resources	Low	Low
	4B: Water Surface Resources	Med	Low
	4C: Shore Resources	Med	Med
Summary Risk Scores		12	10

The determination of each risk factor is explained in the document. This summary table is found on page 38.

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

Vessel Particulars

Official Name: *Gulfpenn*

Official Number: 221244

Vessel Type: Tanker

Vessel Class: 8,862 gross ton class
Tanker (12,880 dwt)

Former Names: *Agwihavre*

Year Built: 1921



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

Builder's Hull Number: 40

Flag: American

Owner at Loss: Gulf Oil Corporation

Controlled by: Unknown

Chartered to: Unknown

Operated by: Unknown

Homeport: Philadelphia, PA

Length: 480 feet

Beam: 66 feet

Depth: 36 feet

Gross Tonnage: 8,862

Net Tonnage: 5,522

Hull Material: Steel

Hull Fastenings: Riveted

Powered by: Oil-fired steam

Bunker Type: Heavy Fuel Oil (Bunker C)

Bunker Capacity (bbl): 13,374

Average Bunker Consumption (bbl) per 24 hours: 370

Liquid Cargo Capacity (bbl): 104,181

Dry Cargo Capacity: Unknown

Tank or Hold Description: Vessel had 10 cargo tanks divided port and starboard

Casualty Information

Port Departed: Port Arthur, TX

Destination Port: Philadelphia, PA

Date Departed: May 12, 1942

Date Lost: May 13, 1942

Number of Days Sailing: ≈ 2

Cause of Sinking: Act of War (Torpedoes)

Latitude (DD): 28.48358

Longitude (DD): -89.20004

Nautical Miles to Shore: 30

Nautical Miles to NMS: 265

Nautical Miles to MPA: 2.82

Nautical Miles to Fisheries: Unknown

Approximate Water Depth (Ft): 1,820

Bottom Type: Unknown

Is There a Wreck at This Location? The coordinates listed above are probably incorrect but BOEM has accurate coordinates for the location of this shipwreck

Wreck Orientation: Resting on an even keel

Vessel Armament: None

Cargo Carried when Lost: 90,000 bbl of fuel oil distributed evenly in tanks

Cargo Oil Carried (bbl): 90,000

Cargo Oil Type: Unknown Fuel Oil

Probable Fuel Oil Remaining (bbl): $\leq 13,374$

Fuel Type: Heavy Fuel Oil (Bunker C)

Total Oil Carried (bbl): $\leq 103,300$

Dangerous Cargo or Munitions: No

Munitions Carried: None

Demolished after Sinking: No

Salvaged: No

Cargo Lost: Yes, partially

Reportedly Leaking: No

Historically Significant: Yes

Gravesite: Yes

Salvage Owner: Not known if any

[illegible]**Chart Number: 411**

"At 12.30 hours on 13 May 1943, the unescorted and unarmed *Gulfpenn* (Master Arthur S. Hodges) was steaming five miles ahead of the *Gulfprince*, when the other tanker was attacked by *U-507* (Schacht). The *Gulfpenn* immediately left the scene on full speed and later steered zigzagging course in irregular patterns at 12.5 knots.

[-http://www.uboa.net:8080/allies/merchants/ships/1645.html](http://www.uboa.net:8080/allies/merchants/ships/1645.html)

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was in the aft section of the vessel, and killed all of the personnel on duty in that location. The vessel sank stern first and swiftly plunged to the bottom of the Gulf of Mexico. Twenty-five crewmembers survived the attack, but thirteen men were killed."

<http://www.pastfoundation.org/DeepWrecks/Gulfpenn.htm>

Under Arthur S. Hodges the *Gulf Penn* was hit by torpedos from *U-506* (Wurdermann) while traveling from Port Arthur, TX to Philadelphia. The torpedo struck aft in the starboard engine room when the ship was about 250 miles from Port Arthur. The ship exploded, made a half circle, and sank stern first. 13 were lost.

- B.M. Browning Jr., "U.S. Merchant Vessel War Casualties of World War II", (Naval Institute Press, 1996), 101-102.

-C. Hocking, "Dictionary of Disasters at Sea During the Age of Steam: Including sailing ships and ships of war lost in action 1824-1962" (Lloyd's Register of Shipping, 1969), 290.

--- M. Wiggins "Torpedoes in the Gulf: Galveston and the U-Boats 1942-1943" Texas A&M University Press, College Station (1995), 53.

General Notes

AWOIS Data:

DESCRIPTION

24 NO.815; TANKER, 8862 GT; SUNK 5/13/42 BY SUBMARINE; POSITION ACCURACY 1-3 MILES. 61 5/13/42

Wreck Condition/Salvage History

"In 1994, the wreck of *Gulfpenn* was discovered during a deepwater survey in Mississippi Canyon, detected at the edge of the survey swath by side-scan sonar. Marine archaeologist Laura Landry tentatively identified the shipwreck as *Gulfpenn* (Landry, 1994). Between August 4 and 5 and August 11 and 13, 2004, the science team collected the first spectacular images of *Gulfpenn*. The wreck is oriented with the bow pointing north-northwest. Water depths range from approximately 553 m at the bow to 555 m at the stern. The vessel's bow stands approximately 19 m proud of the seafloor as opposed to the aft deckhouse, which rises only 5.5 m above the ambient seafloor. The bow and forward section are relatively intact, but the superstructure's upper works show considerable deterioration. The pilothouse is gone and the bridge's deck is disintegrating. The ship's telegraph has fallen over and spans part of the metal framework of the bridge. The superstructure's starboard side is almost entirely covered by coral colonies. Extensive damage is present aft of the vessel's main superstructure. Although the catwalk and piping from the main structure to the aft deckhouse are intact, the hull amidships has partially collapsed. *Gulfpenn's* aft portion exhibits the most severe damage. The deck of the aft deckhouse is deteriorating and has partially collapsed inward, exposing the interior. Almost 11 m of the stern is missing and the hull ends abruptly in a contortion of mangled metal plating. An extensive artifact scatter surrounds the wreck site. The main debris zone extends nearly 161 m northwest from the vessel. The stern's missing section lies within the main debris field 27 m northwest of the bow. Other material within this dense debris field includes vent hoods and pipe, railing, twisted metal, and a lifeboat."

http://www.tos.org/oceanography/issues/issue_archive/issue_pdfs/22_2/22.2_church.pdf

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

The tanker *Gulfpenn* was sunk by German Submarine *U-506* off the coast of Louisiana on May 13, 1942. At the time of its loss, the tanker was carrying 90,000 bbl of fuel oil and had a bunker capacity of 13,374 bbl of Bunker C fuel oil. As the ship travelled from Port Arthur, Texas destined for Philadelphia, Pennsylvania, one torpedo struck the tanker while it was off the mouth of the Mississippi River (Fig. 1-1). The torpedo struck aft in the engine room, killing all crewmembers stationed there, and destroying the engines. The ship proceeded to steam in a half circle before plunging by the stern five minutes after the torpedo struck.

Although the tanker did not explode and sank quickly, the deck was ruptured in the attack, which may have enabled oil to escape from the vessel after it sank. Today, the tanker is in 1,820 feet of water and rests upright on its keel, which is an orientation that often leads to the loss of oil from vents and piping long before loss of structural integrity of hull plates from corrosion or other physical impacts and may mean the tanks no longer contain oil. Reports of the wreck also reveal that part of the hull amidships has collapsed and parts of the wreck show considerable deterioration.

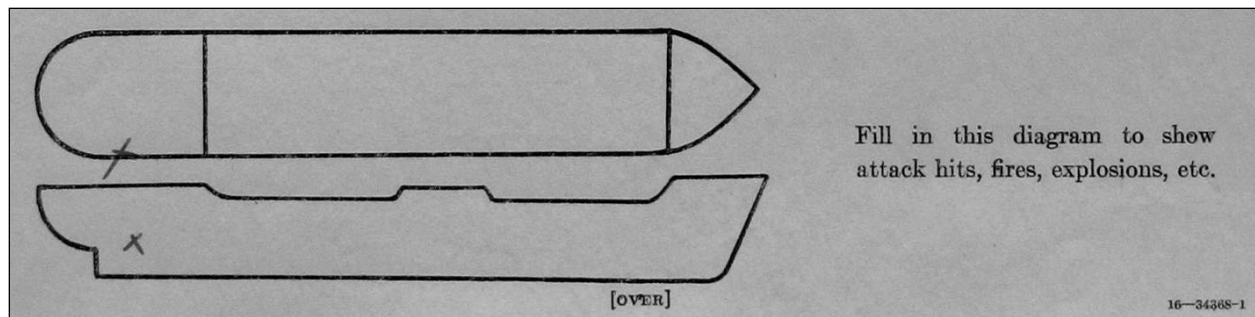


Figure 1-1: U.S. Coast Guard diagram of the location of torpedo impact on *Gulfpenn* (Image courtesy of National Archives, Washington, DC).

Because NOAA archaeologists have never examined the site, we cannot provide additional condition based assessments of the wreck, but archaeologists with the Bureau of Ocean Energy Management (BOEM), Bureau of Safety and Environmental Enforcement (BSEE), and C & C Technologies, Inc. have visited the site and can provide additional information to the U.S. Coast Guard if necessary. If the U.S. Coast Guard decides to assess the wreck, it should first contact the archaeologists with BOEM and BSEE for more information as well as to ensure compliance with archaeological standards for assessing a historic resource.

It should also be noted that this vessel is of historic significance and will require appropriate actions be taken under the National Historic Preservation Act (NHPA) and possibly the Sunken Military Craft Act (SMCA) prior to any actions that could impact the integrity of the vessel. This vessel may be eligible for listing on the National Register of Historic Places and is considered a war grave and appropriate actions should be undertaken to minimize disturbance to the site.

Background Information References

Vessel Image Sources: <http://www.uboaat.net/allies/merchants/ships/1645.html>

Construction Diagrams or Plans in RULET Database? No

Text References:

http://www.tos.org/oceanography/issues/issue_archive/issue_pdfs/22_2/22.2_church.pdf

AWOIS database No. 243

<http://oceanexplorer.noaa.gov/explorations/08lophelia/background/archeology/archeology.html>

<http://www.uboaat.net/allies/merchants/ships/1645.html>

Vessel Risk Factors

In this section, the risk factors that are associated with the vessel are defined and then applied to the *Gulfpenn* 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 1-2 is simple and straightforward and, in combination with the accompanying

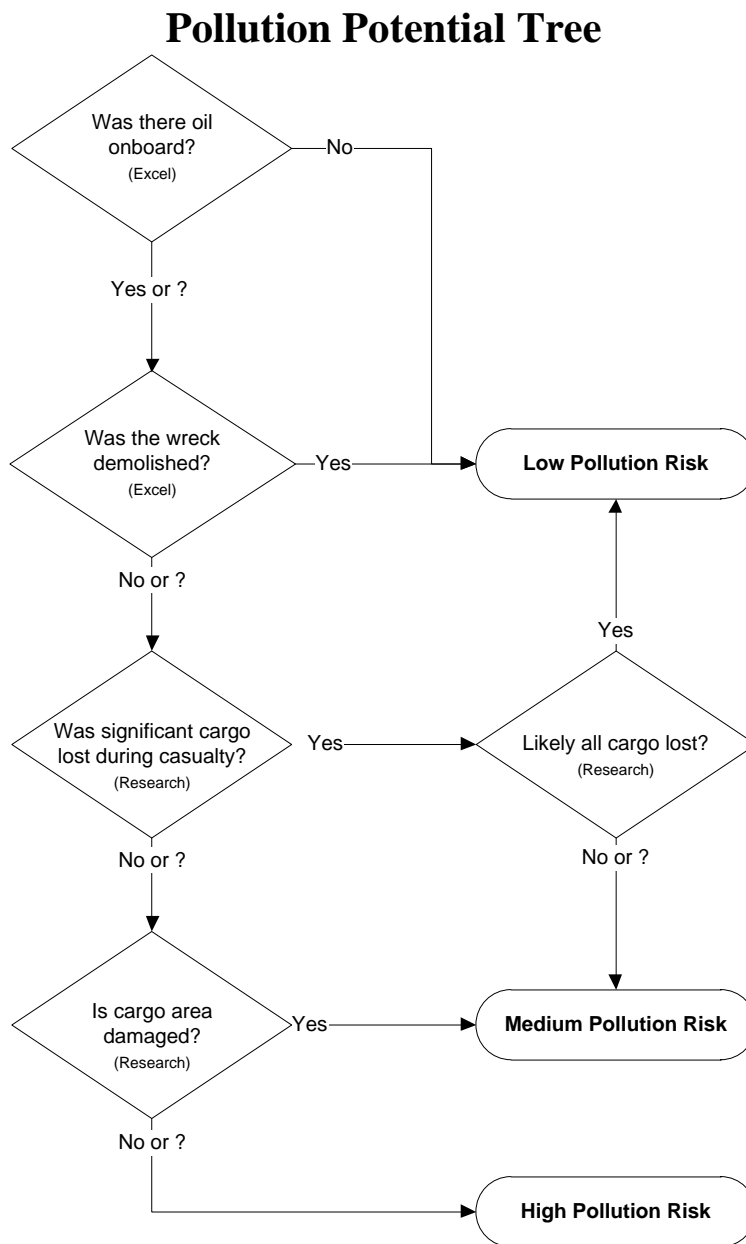


Figure 1-2: U.S. Coast Guard Salvage Engineering Response Team (SERT) developed the above Pollution Potential Decision Tree.

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.

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.

Each risk factor is characterized as High, Medium, or Low Risk or a category-appropriate equivalent such as No, Unknown, Yes, or Yes Partially. The risk categories correlate to the decision points reflected in Figure 1-2.

Each of the risk factors also has a “data quality modifier” that reflects the completeness and reliability of the information on which the risk ranks were assigned. The quality of the information is evaluated with respect to the factors required for a reasonable preliminary risk assessment. The data quality modifier scale is:

- **High Data Quality:** All or most pertinent information on wreck available to allow for thorough risk assessment and evaluation. The data quality is high and confirmed.
- **Medium Data Quality:** Much information on wreck available, but some key factor data are missing or the data quality is questionable or not verified. Some additional research needed.
- **Low Data Quality:** Significant issues exist with missing data on wreck that precludes making preliminary risk assessment, and/or the data quality is suspect. Significant additional research needed.

In the following sections, the definition of low, medium, and high for each risk factor is provided. Also, the classification for the *Gulfpenn* is provided, both as text and as shading of the applicable degree of risk bullet.

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 *Gulfpenn* is ranked as High Volume because it is thought to have a potential for up to 13,374 bbl of bunker fuel remaining, although some of that may have been lost at the time of the casualty due to the explosions. It is assumed that the cargo of gasoline was released at the time of casualty or after the vessel sank. Data quality is medium.

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 *Gulfpenn*.

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 Guard oil grouping¹. (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 *Gulfpenn* is classified as High Risk because the bunker fuel is heavy fuel oil, a Group IV oil type. Data quality is high.

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 *Gulfpenn* 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

¹ 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]

The *Gulfpenn* is classified as High Risk because there was no 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 *Gulfpenn* is classified as High Risk because no 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 *Gulfpenn* is classified as Medium Risk because there was one torpedo detonation. 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 *Gulfpenn* is classified as High Risk because it is not broken apart and remains in one contiguous piece. 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.

The *Gulfpenn* is resting upright on the bottom. 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.

The *Gulfpenn* is 1,820 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 *Gulfpenn* has been surveyed by BOEM and C & C technologies. 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 *Gulfpenn* did not carry any munitions. 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 *Gulfpenn*. Operational factors are listed but do not have a risk score.

Table 1-1: Summary matrix for the vessel risk factors for the *Gulfpenn* 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)	Medium	Maximum of 13,374 bbl, not reported to be leaking	Med
	A2: Oil Type	High	Bunker fuel is heavy fuel oil, a Group IV oil type	
	B: Wreck Clearance	High	Vessel not reported as cleared	
	C1: Burning of the Ship	High	No fire was reported	
	C2: Oil on Water	High	No oil was reported on the water	
	D1: Nature of Casualty	High	One torpedo detonation	
	D2: Structural Breakup	High	Vessel remains in one contiguous piece	
Archaeological Assessment	Archaeological Assessment	High	Detailed sinking records and site reports of this ship exist, assessment is believed to be very accurate	Not Scored
Operational Factors	Wreck Orientation	High	Upright	Not Scored
	Depth	High	1,820 ft	
	Visual or Remote Sensing Confirmation of Site Condition	High	Location has been surveyed	
	Other Hazardous Materials Onboard	High	No	
	Munitions Onboard	High	No	
	Gravesite (Civilian/Military)	High	Yes	
	Historical Protection Eligibility (NHPA/SMCA)	High	NHPA and possibly SMCA	

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 *Gulfpenn* this would be about 14,000 bbl (rounded up from 13,374 bbl) based on current estimates of the maximum amount of oil remaining onboard the wreck.

The likeliest scenario of oil release from most sunken wrecks, including the *Gulfpenn*, 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 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 *Gulfpenn*.

Scenario Type	Release per Episode	Time Period	Release Rate	Relative Likelihood	Response Tier
Chronic (0.1% of WCD)	14 bbl	Fairly regular intervals or constant	100 bbl over several days	More likely	Tier 1
Episodic (1% of WCD)	140 bbl	Irregular intervals	Over several hours or days	Most Probable	Tier 1-2
Most Probable (10% of WCD)	1,400 bbl	One-time release	Over several hours or days	Most Probable	Tier 2
Large (50% of WCD)	7,000 bbl	One-time release	Over several hours or days	Less likely	Tier 2-3
Worst Case	14,000 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.

As discussed in the NOAA 2013 Risk Assessment for Potentially Polluting Wrecks in U.S. Waters, NOAA identified 87 high and medium priority wrecks for screening-level risk assessment. Within the available funds, it was not feasible to conduct computer model simulations of all 87 high and medium priority wrecks. Therefore, efforts were made to create “clusters” of vessels in reasonable proximity and with similar oil types. In general, the wreck with the largest potential amount of oil onboard was selected for modeling of oil release volumes, and the results were used as surrogates for the other vessels in the cluster. In particular, the regression curves created for the modeled wreck were used to determine the impacts to water column, water surface, and shoreline resources. The *Gulfpenn*, with up to 13,374 bbl of heavy fuel onboard, was clustered with the *R.W. Gallagher*, which was modeled at 86,000 bbl of heavy fuel oil. Figure 2-1 shows the location of both vessels.

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.

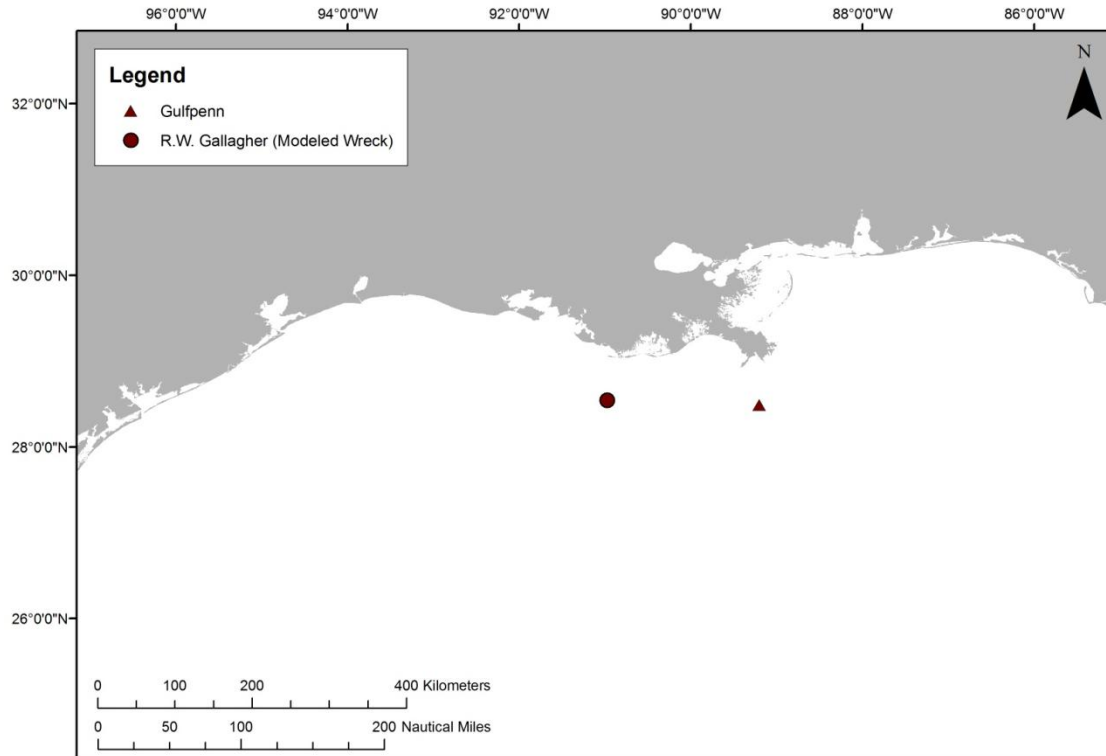


Figure 2-1: Location of the *Gulfpenn* (red triangle), the wreck discussed in this package, and the *R.W. Gallagher* (red circle) which was the wreck that was actually modeled in the computer modeling simulations. The results for the *R.W. Gallagher* are used to estimate the impacts of releases from the *Gulfpenn*, as discussed in the text.

Oil Type for Release

The *Gulfpenn* contained a maximum of 13,374 bbl of Bunker C fuel oil as the bunker fuel (a Group IV oil). Thus, the spill model for the *R.W. Gallagher*, which was run using heavy fuel oil, was used for this assessment of the *Gulfpenn*.

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^2 , 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^2 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^2 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/m² 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.² Because oil often strands onshore as tarballs, Table 2-2a shows the number of tarballs per m² 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 ²	~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 ²	~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 ²	~0.12-0.14 tarballs/m ²	Socio-economic Impacts to Shoreline Users/Risk Factor 4C-1 and 2
Oil Slick/Tarballs	Brown to Black	0.1 mm	100 g/m ²	~12-14 tarballs/m ²	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 *Gulfpenn* 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 mi² 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 2-2, which is the regression curve for the *R.W. Gallagher*. Using this figure, the water column impacts can be estimated for any spill volume. On Figure 2-2, arrows are used to indicate the where the WCD for the *Gulfpenn* plots on the curve and how the area of the water column impact is determined.

² 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. Office of Environmental Policy and Compliance, U.S. Dept. Interior, Washington, DC.

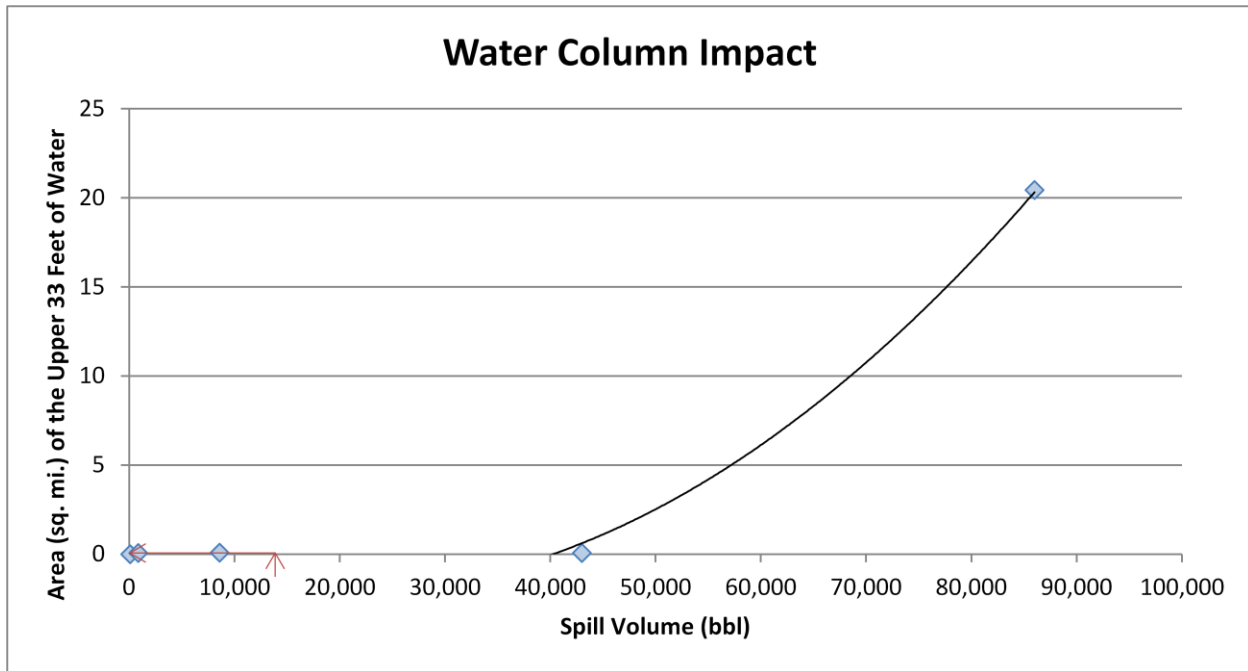


Figure 2-2: Regression curve for estimating the area of water column at or above 1 ppb aromatics impacted as a function of spill volume for the *Gulfpenn*. This regression curve was generated for the *R.W. Gallagher*, which has the same oil type and similar volume of potential releases as the *Gulfpenn*. The arrows indicate where the Most Probable Discharge for the *Gulfpenn* falls on the curve and how the area of water column impact can be determined for any spill volume.

Potential Water Surface Slick

The slick size from an oil release 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 for the *R.W. Gallagher* then using the regression curve shown in Figure 2-3 to calculate the values for the different release scenarios for the *Gulfpenn*. Note that this is an estimate of total water surface affected over a 30-day period. The slick will not be continuous but rather be broken and patchy. Surface expression is likely to be in the form of sheens, tarballs, and streamers. In the model, the representative heavy fuel oil used for this analysis spreads to a minimum thickness of approximately 975 g/m^2 , and the oil is not able to spread any thinner, owing to its high viscosity. As a result, water surface oiling results are identical for the 0.01 and 10 g/m^2 thresholds. The location, size, shape, and spread of the oil slick(s) from an oil release from the *Gulfpenn* will depend on environmental conditions, including winds and currents, at the time of release and in its aftermath. Refer to the risk assessment package for the *R.W. Gallagher* for maps (Figs. 2-2 and 2-3) showing the areas potentially affected by slicks using the Most Probable volume and the socio-economic and ecological thresholds.

Table 2-3: Estimated slick area swept on water for oil release scenarios from the *Gulfpenn*, based on the model results for the *R.W. Gallagher*.

Scenario Type	Oil Volume (bbl)	Estimated Slick Area Swept Mean of All Models	
		0.01 g/m ²	10 g/m ²
Chronic	14	140 mi ²	140 mi ²
Episodic	140	500 mi ²	500 mi ²
Most Probable	1,400	1,700 mi ²	1,700 mi ²
Large	7,000	4,100 mi ²	4,100 mi ²
Worst Case Discharge	14,000	5,900 mi ²	5,900 mi ²

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 for the *R.W. Gallagher*, which is shown in Figure 2-3 and referenced in Table 2-3. Using this figure, the area of water surface with a barely visible sheen can be estimated for any spill volume from the *Gulfpenn*.

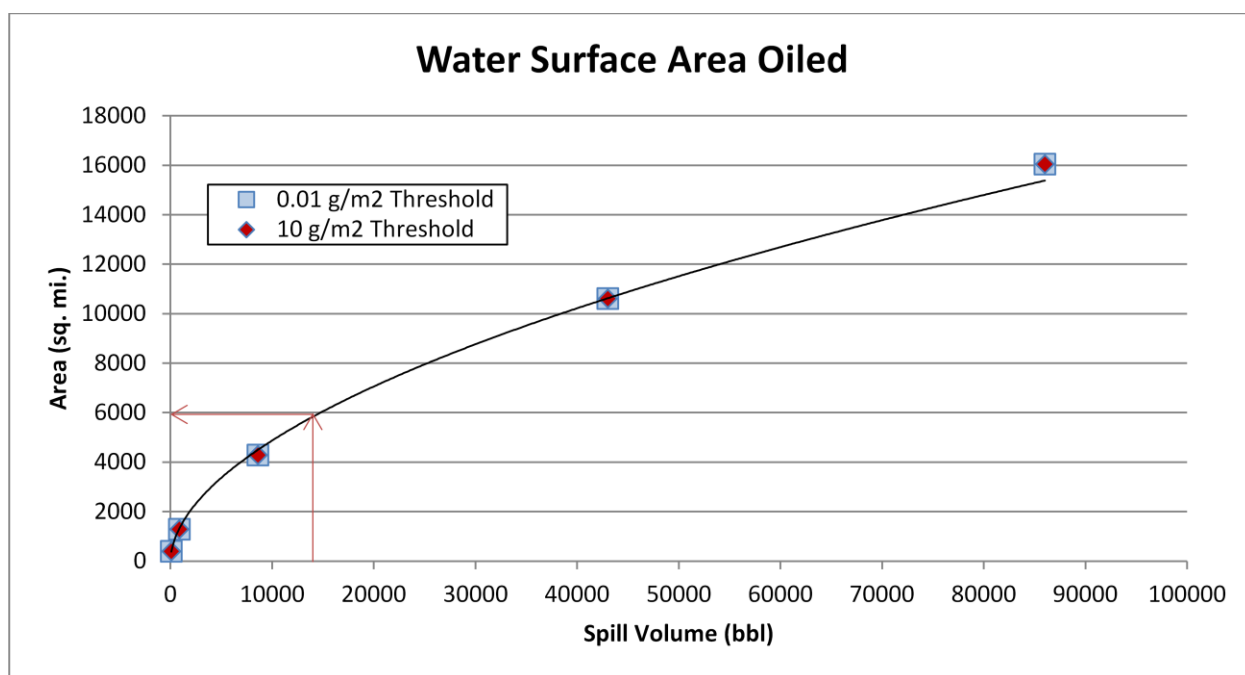


Figure 2-3: Regression curve for estimating the amount of water surface oiling as a function of spill volume for the *Gulfpenn*, showing both the ecological threshold of 10 g/m² and socio-economic threshold of 0.01 g/m², based on the model results for the *R.W. Gallagher*. The arrows indicate where the Most Probable Discharge for the *Gulfpenn* falls on the curve and how the area of water surface impact can be determined for any spill volume. The curves for each threshold are so similar that they plot on top of each other.

Potential Shoreline Impacts

Based on these modeling results, shorelines at risk of oiling extend from the Chandeleur Islands to south of the Rio Grande, into Mexico. (Refer to Figure 2-6 in the *R.W. Gallagher* package to see the probability of oil stranding on the shoreline at concentrations that exceed the threshold of 1 g/m^2 , for the Most Probable release). 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. Estimated miles of shoreline oiling above the socio-economic threshold of 1 g/m^2 and the ecological threshold of 100 g/m^2 by scenario type are shown in Table 2-4.

Table 2-4: Estimated shoreline oiling from leakage from the *Gulfpenn*, based on the modeling results for the *R.W. Gallagher*.

Scenario Type	Volume (bbl)	Estimated Miles of Shoreline Oiling Above 1 g/m^2	Estimated Miles of Shoreline Oiling Above 100 g/m^2
Chronic	14	17	1
Episodic	140	22	3
Most Probable	1,400	30	8
Large	7,000	38	16
Worst Case Discharge	14,000	41	22

The actual shore length affected by a release will be determined by the volume of leakage and environmental conditions during an actual release. 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 for the *R.W. Gallagher*, as detailed in Table 2-4 and shown in Figure 2-4. Using this figure, the shore length oiled can be estimated for any spill volume from the *Gulfpenn*.

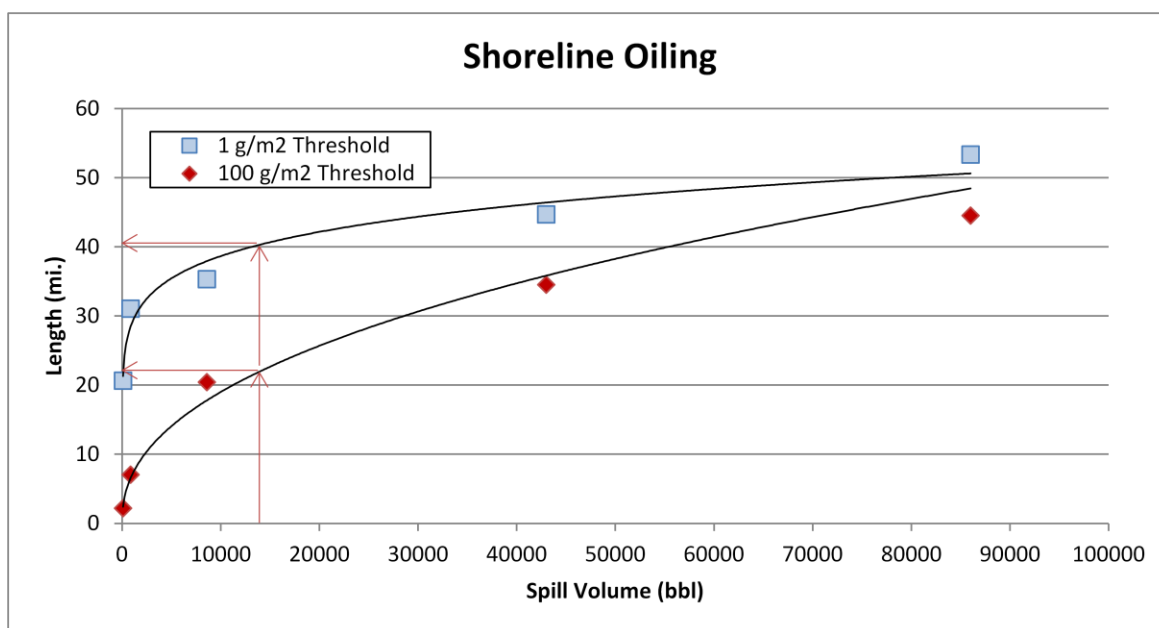


Figure 2-4: Regression curve for estimating the amount of shoreline oiling at different thresholds as a function of spill volume for the *Gulfpenn*, based on the model results for the *R.W. Gallagher*. The arrows indicate where the Most Probable Discharge for the *Gulfpenn* falls on the curve and how the length of shoreline impact can be determined for any spill volume.

SECTION 3: ECOLOGICAL RESOURCES AT RISK

Ecological resources at risk from a catastrophic release of oil from the *Gulfpenn* (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. Coastal marshes and barrier islands support large number of nesting shorebirds and wading birds and provide foraging grounds for overwintering shorebirds and waterfowl and migrating shorebirds and passerines. In addition, nearshore waters of the Gulf support highly productive coastal fisheries for both finfish and invertebrates. Kemp's ridley sea turtles use coastal waters heavily to travel between nesting beaches in South Texas and Mexico and foraging grounds near the Mississippi River Delta.

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

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

Species Group	Species Subgroup and Geography	Seasonal Presence
Coastal birds	<ul style="list-style-type: none"> Louisiana bays are important habitat for wintering waterfowl, supporting densities of up to 900 birds per square mile Raptors (American kestrel, northern harriers, red-tailed hawk, turkey vulture, Cooper's hawk, osprey, bald eagle) can all be present in the coastal marshes Half of North American population of mottled duck inhabits Louisiana 	<p>Ospreys present during winter</p> <p>Mottled duck nests Mar-Sep</p>
Nesting and migratory hotspots	<p><i>Chandeleur Islands</i> *bp = breeding pairs, otherwise numbers are individual bird counts</p> <ul style="list-style-type: none"> Critical habitat for wintering piping plover (FT) Most abundant nesters: brown pelican (1,642 bp), laughing gull, Caspian tern, black skimmer (575 bp), royal tern (1-9,000 bp), sandwich tern (<33,000 bp) Redhead and lesser scaup are common Stopover for migratory birds <p><i>Mississippi Delta (Pass a Loutre State WMA, Delta NWR)</i></p> <ul style="list-style-type: none"> Nesting habitat for mottled duck (445), secretive marsh birds, wading birds and brown pelican (2-3,000 bp) High densities of king rails in the marsh Habitat for 100,000 wintering waterfowl, including canvasback (9,000), northern pintail (48,000), gadwall (36,000) Wintering habitat for western sandpiper, least sandpiper and dunlin <p><i>Barataria-Terrebonne Bays</i></p> <ul style="list-style-type: none"> Grand Isle State Park is important migratory bird and snowy plover stopover High abundances of overwintering blue and green-winged teal, American wigeon, ring-necked duck, lesser scaup, mallard, gadwall, and geese Piping plovers overwintering on Elmer's Island, W Grand Terre, and Fourchon east (~50 total) Nesting: Short-billed dowitcher (1,800), Wilson's plover (176 bp), black skimmer (899), gull-billed tern (>100), Forster's tern (600-900 bp), least tern (321 bp), little blue heron (2,690 bp, 7 colonies), white ibis (2,500), roseate spoonbill (125 bp) <p><i>Isle Dernieres and Timbalier Islands</i></p> <ul style="list-style-type: none"> Raccoon Island has extremely high abundance of brown pelican, Wilson's plover, royal and sandwich tern, great, snowy and reddish egret, great blue and tricolored heron 	<p>Piping plover present Aug-May</p> <p>Wilson's plover nests May-Aug</p> <p>Short-billed dowitcher present in winter</p> <p>Roseate spoonbill nests Mar-Jul</p> <p>Mottled duck nests Mar-Sep</p> <p>Egrets nest Feb-Jul</p> <p>Ibises nest Apr-Aug</p> <p>Herons nest Mar-Aug</p> <p>Gulls nest Apr-Jul</p> <p>Skimmers nest May-Sep; Terns nest Apr-Sep</p> <p>Migrating shorebirds present spring and fall Wintering waterfowl present Oct-Mar</p>

Species Group	Species Subgroup and Geography	Seasonal Presence
	<ul style="list-style-type: none"> • Important wintering piping plover (50-100), snowy plover (<100) habitat • Stopover for long-billed curlew, red knot, and other shorebirds • Emergency stopover for passerines • Nesting: black skimmer (500 bp), sandwich tern (2,600 bp), least tern (50 bp), brown pelican (6,600 bp), Wilson's plover (150 bp) <p><i>Atchafalaya Delta</i></p> <ul style="list-style-type: none"> • Very important for wintering waterfowl, wading birds, and black skimmer • Marsh and scrub habitats important for rails, cranes, gulls, shorebirds, terns <p><i>Chenier Plain</i></p> <ul style="list-style-type: none"> • Shell Keys Isl. stopover for white pelicans (1,807), brown pelicans, terns, gulls • > 400k overwintering ducks and geese • Mottled duck (1,000-2,000) present • Nesting: Forster's tern (800 bp), gull-billed tern (200 bp), black skimmer (400 bp), roseate spoonbill (200 bp) • Piping plover (30), long-billed dowitcher (6,000) habitat present <p><i>Bolivar Flats</i></p> <ul style="list-style-type: none"> • 100,000s of birds • Resting and feeding location for migrating shorebirds (American avocet, American golden-plover, semipalmated plover, Wilson's plover, piping plover, snowy plover). • Resident mottled duck • Breeding roseate spoonbills (50) <p><i>Jigsaw Island</i></p> <ul style="list-style-type: none"> • Nesting: American oystercatcher (5 bp), black skimmer (10 bp), laughing gull (50 bp), Caspian tern (6 bp), royal terns (600 bp), sandwich tern (300 bp), tricolored heron <p><i>Mustang Bayou Island</i> – wading birds, black skimmer, gull-billed/royal terns nesting</p> <p><i>Sundown Island (West Matagorda)</i> – 18 species of colonial nesting birds, including one of the largest colonies of reddish egret in Texas (15,000 bp)</p> <ul style="list-style-type: none"> • Nesting laughing gull (3,000 bp), royal tern (4,000 bp), sandwich tern (600 bp), tricolored heron (200 bp), brown pelican (2,000 bp), black skimmer, gull-billed tern, Caspian tern, reddish egret, little blue heron, snowy egret, great blue heron, great egret, cattle egret, white ibis, roseate spoonbill (these are all in lesser concentrations than above) <p><i>Laguna Vista spoils</i></p> <ul style="list-style-type: none"> • Nesting gull-billed tern, royal tern, sandwich tern (1,000s), reddish egret, black skimmer <p><i>Pelagic distribution</i></p> <p>Convergence zones (thermoclines and warm core eddies) are areas of high biodiversity and abundance. Bird assemblages change seasonally</p> <ul style="list-style-type: none"> • Early summer - terns, storm-petrels and gulls common; jaegers and shearwaters less common; tropicbirds, sulids and frigatebirds rare • Mid-summer - black terns extremely common; band-rumped storm petrel, magnificent frigatebird, Audubon's shearwater, sooty tern present • Late summer - high abundances of terns • Fall - laughing gull, royal tern, Pomarine jaeger common 	

Species Group	Species Subgroup and Geography	Seasonal Presence
	<ul style="list-style-type: none"> Fall/winter - skuas present Winter - herring and laughing gulls common 	
Sea Turtles	<p><i>Nesting</i></p> <ul style="list-style-type: none"> Kemp's ridley (FE, SE) high nest counts on North Padre Island (~100 nests/yr) and low (<25 nests/yr) from Galveston Bay to northern Mexico Densities of nesting Kemp's ridley sea turtles increase greatly (100s-1,000s per year) just south of the model extent; their major nesting ground is at Rancho Nuevo, Mexico Loggerheads (FT, ST) nest on the Chandeleur Islands and coastal Texas in low abundance Greens (FT, ST) nest on beaches north to North Padre Island in low numbers Hawksbill (FE, SE) and leatherback (FE, SE) nesting can occur on Padre Island National Seashore but is extremely rare <p><i>Distribution</i></p> <ul style="list-style-type: none"> Coastal Louisiana is a major foraging ground for Kemp's ridley <i>Sargassum</i> is important habitat for juvenile sea turtles South Texas and northern Mexico inshore waters are important foraging grounds for juvenile green sea turtles Shelf waters are important adult habitat for loggerheads 	<p>Loggerheads nest May-Oct</p> <p>Kemp's ridley and Green nest Mar-Jul, hatch Apr-Sep</p> <p>Leatherbacks and hawksbills nest during the summer</p>
Reptiles	<p>Rockefeller State Wildlife Refuge/Game Preserve has highest alligator nesting density in U.S.</p> <p>Diamondback terrapins can be found along the gulf shoreline in the area of impact</p>	
Marine Mammals	<p>Bottlenose dolphins (35-45k): Common in coastal waters including rivers, bays, and sounds throughout potential spill area. High concentrations in coastal Louisiana, especially around inlets and passes</p> <p>Whales and dolphins are often associated with shelf edge features, convergence zones, and <i>Sargassum</i> mats</p> <p>Manatees can be present in low abundance in inland waters</p>	<p>Manatees present spring-fall</p>
Terrestrial mammals	<p>Northern river otter, mink, nutria and muskrat can all be present in marsh habitats</p>	
Fish	<p><i>Inshore distributions</i></p> <ul style="list-style-type: none"> Marsh habitats are extremely productive and support high biodiversity and abundance of resident estuarine fish Estuarine areas important nursery grounds for many commercial species: red, mutton, gray, lane, dog, yellowtail snapper, goliath, red, gag, yellowfin grouper Coastal nursery areas for blacktip sharks, spinner sharks, Atlantic sharpnose sharks, bull sharks, sandbar sharks in the region Passes are often sites of fish spawning <p><i>Common in state waters</i></p> <ul style="list-style-type: none"> Gulf sturgeon (FT), bull shark, blacktip shark, spinner shark, silky shark, sharpnose shark, red snapper, mullet, lane snapper, red drum, gray snapper, vermillion snapper, king and Spanish mackerel, gag grouper, spotted seatrout, cobia, greater amberjack, black drum, hardheaded catfish, tarpon <p><i>Offshore distributions</i></p> <ul style="list-style-type: none"> Surface-oriented fish include hammerhead sharks, tiger sharks, silky sharks, mako sharks, manta rays, eagle rays, cownose ray, tunas, billfish, molasses Whale shark hotspot near mouth of the Mississippi Bluefin tuna spawn in areas offshore of coastal Texas and Louisiana 	<p>Shark species pup spring-summer</p> <p>Bluefin tuna are present to spawn in the spring</p> <p>Estuarine dependent fish migrate offshore in the fall/winter to spawn; juveniles and adults use estuaries during the spring/summer</p> <p>Bluefin tuna spawn offshore Apr-May</p>

Species Group	Species Subgroup and Geography	Seasonal Presence
	<ul style="list-style-type: none"> <i>Sargassum</i> is important habitat for juvenile of some pelagic fish species (i.e., dolphinfish, jacks, and triggerfish) 	
Invertebrates	Significant shrimp fisheries occur for white shrimp, brown shrimp, blue crabs, gulf stone crabs and oysters in coastal areas <ul style="list-style-type: none"> Spawning occurs offshore, larval and juvenile development occurs in estuarine waters Female blue crabs move to deeper waters to spawn 	Spawning: Brown shrimp Mar-Jul; White shrimp Apr-Nov; Blue crab peaks Aug-Sep; Oysters in late spring and early fall
Benthic habitats	Submerged aquatic vegetation is critical to numerous species and can be found in bays and sounds south of Galveston Bay. Larger and more contiguous beds occur on the inland side of the Chandeleur Islands and south of Matagorda Bay	Year round

The Environmental Sensitivity Index (ESI) atlases for the potentially impacted coastal areas from a leak from the *Gulfpenn* 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/m² for water surface impacts; and 100 g/m² 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 *Gulfpenn* is provided, both as text and as shading of the applicable degree of risk bullet, for the WCD release of 14,000 bbl and a border around the Most Probable Discharge of 1,400 bbl. Please note: The probability of oiling cannot be determined using the regression curves; probability can only be determined from the 200 model runs. Thus, the modeling results and regression curves for the *R.W. Gallagher* are used to estimate the values used in the risk scoring for the degree of oiling only.

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 (not scored)

This risk factor reflects the probability that at least 0.2 mi² 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 mi² of the upper 33 feet of the water column at the threshold level
- **Medium Impact:** impact on 0.2 to 200 mi² of the upper 33 feet of the water column at the threshold level
- **High Impact:** impact on more than 200 mi² of the upper 33 feet of the water column at the threshold level

The *Gulfpenn* is classified as Low Risk for degree of oiling for water column ecological resources for the WCD of 14,000 bbl because the mean volume of water contaminated in the model runs was 0 mi² of the

upper 33 feet of the water column. For the Most Probable Discharge of 1,400 bbl, the *Gulfpenn* is classified as Low Risk for degree of oiling because the mean volume of water contaminated was 0 mi² 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/m² (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 (not scored)

This risk factor reflects the probability that at least 1,000 mi² 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 mi² of water surface impact at the threshold level
- **Medium Impact:** 1,000 to 10,000 mi² of water surface impact at the threshold level
- **High Impact:** more than 10,000 mi² of water surface impact at the threshold level

The *Gulfpenn* is classified as Medium Risk for degree of oiling for water surface ecological resources for the WCD because the mean area of water contaminated in the model runs was 5,900 mi². It is classified as Medium Risk for degree of oiling for the Most Probable Discharge because the mean area of water contaminated was 1,700 mi².

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. For the modeled wrecks, shorelines were 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. In this risk analysis for the *Gulfpenn*, shorelines have NOT been weighted by their degree of sensitivity to oiling because these data are available only for modeled vessels. Therefore, the impacts are evaluated only on the total number of shoreline miles oiled as determined from the regression curve.

Risk Factor 3C-1: Shoreline Probability of Oiling of EcoRAR (not scored)

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/m² (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/m² 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 *Gulfpenn* is classified as Medium Risk for degree of oiling for shoreline ecological resources for the WCD because the mean length of shoreline contaminated in the model runs was 22 miles. It is classified as Low Risk degree of oiling for the Most Probable Discharge because the mean length of shoreline contaminated in the model runs was 8 miles.

Considering the modeled risk scores and the ecological resources at risk, the ecological risk from potential releases of the WCD of 14,000 bbl of heavy fuel oil from the *Gulfpenn* is summarized as listed below and indicated in the far-right column in Table 3-2:

- Water column resources – Low, because little impacts are likely
- Water surface resources – Medium, because of the very large number of wintering, nesting, and migratory birds that use both coastal and estuarine habitats at risk, sea turtle concentrations in *Sargassum* habitat, and the persistence of tarballs that can be transported long distances. It should be noted that oil on the surface will not be continuous but rather be broken and patchy and in the form of sheens, tarballs, and streamers
- Shoreline resources – Medium, because many sensitive shoreline resources include wetlands which are difficult to clean and under long-term decline, large bird nesting colonies, turtle nesting beaches, nursery areas for many fish and shellfish, and wintering habitat for listed bird species

Table 3-2: Ecological risk factor scores for the **Worst Case Discharge of 14,000 bbl** of heavy fuel oil from the *Gulfpenn*.

Risk Factor	Risk Score			Explanation of Risk Score	Final Score
3A-1: Water Column Probability EcoRAR Oiling	Low	Medium	High	N/A: Only available for modeled vessels	Low
3A-2: Water Column Degree EcoRAR Oiling	Low	Medium	High	The mean volume of water contaminated above 1 ppb was 0 mi ² of the upper 33 feet of the water column	
3B-1: Water Surface Probability EcoRAR Oiling	Low	Medium	High	N/A: Only available for modeled vessels	Med
3B-2: Water Surface Degree EcoRAR Oiling	Low	Medium	High	The mean area of water contaminated above 10 g/m ² was 5,900 mi ²	
3C-1: Shoreline Probability EcoRAR Oiling	Low	Medium	High	N/A: Only available for modeled vessels	Med
3C-2: Shoreline Degree EcoRAR Oiling	Low	Medium	High	The length of shoreline contaminated by at least 100 g/m ² was 22 mi	

For the Most Probable Discharge of 1,400 bbl of heavy fuel oil, the ecological risk from potential releases from the *Gulfpenn* is summarized as listed below and indicated in the far-right column in Table 3-3:

- Water column resources – Low, because of the very small volume of water column likely affected
- Water surface resources – Medium, because the area affected is smaller, but there are still a large number of birds and sea turtles 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 sheens, tarballs, and streamers
- Shoreline resources – Low, because few miles of shoreline are at risk

Table 3-3: Ecological risk factor scores for the **Most Probable Discharge of 1,400 bbl** of heavy fuel oil from the *Gulfpenn*.

Risk Factor	Risk Score			Explanation of Risk Score	Final Score
3A-1: Water Column Probability EcoRAR Oiling	Low	Medium	High	N/A: Only available for modeled vessels	Low
3A-2: Water Column Degree EcoRAR Oiling	Low	Medium	High	The mean volume of water contaminated above 1 ppb was 0 mi ² of the upper 33 feet of the water column	
3B-1: Water Surface Probability EcoRAR Oiling	Low	Medium	High	N/A: Only available for modeled vessels	Med
3B-2: Water Surface Degree EcoRAR Oiling	Low	Medium	High	The mean area of water contaminated above 10 g/m ² was 1,700 mi ²	
3C-1: Shoreline Probability EcoRAR Oiling	Low	Medium	High	N/A: Only available for modeled vessels	Low
3C-2: Shoreline Degree EcoRAR Oiling	Low	Medium	High	The length of shoreline contaminated by at least 100 g/m ² was 8 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 *Gulfpenn* include recreational beaches in Louisiana and Texas that are very highly utilized year-round, including during spring and fall for shore fishing. 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. There are two national seashores and a number of state parks with heavily utilized beaches.

A release could impact shipping lanes, which accommodate ports and offshore lightering areas in Mississippi, Louisiana, and Texas with a total of 26,000 vessel port calls and over 1.5 billion tonnage annually. Commercial fishing is economically important to the region, as well as to the nation. A release could impact fishing fleets where regional commercial landings for 2010 exceeded \$508 million.

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.

Spill response costs for a release of oil from the *Gulfpenn* 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 *Gulfpenn*.

Resource Type	Resource Name	Economic Activities
National Seashores	Padre Island National Seashore, TX Gulf Island National Seashore, LA	National seashores provide recreation for local and tourist populations while preserving and protecting the nation's natural shoreline treasures. National seashores are coastal areas federally designated as being of natural and recreational significance as a preserved area.
National Wildlife Refuges	Delta NWR (LA) Shell Keys NWR (LA) Sabine NWR (TX) Texas Point NWR (TX) McFaddin NWR (TX) Anahuac NWR (TX) Brazoria NWR (TX) San Bernard NWR (TX) Big Boggy NWR (TX) Aransas NWR (TX)	National wildlife refuges in two states may be impacted. These federally managed and protected lands provide refuges and conservation areas for sensitive species and habitats.
State Parks	Grand Isle SP, LA Cypremort Point SP, LA Sea Rim SP, TX	Coastal state parks are significant recreational resources for the public (e.g., swimming, boating, recreational fishing, wildlife viewing, nature study, sports, dining,

Resource Type	Resource Name	Economic Activities
	Galveston Island SP, TX Matagorda Island SP, TX Goose Island SP, TX Mustang Island SP, TX Point Isabel Lighthouse State Historic Park, TX Boca Chica SP, TX	camping, and amusement parks). They provide income to the states. State parks in Louisiana and Texas are potentially impacted.
Commercial Fishing	Fishing fleets use the western Gulf of Mexico waters for commercial fishing purposes.	
	Aransas Pass-Rockport	Total Landings (2010): \$8.6M
	Brownsville-Port Isabel	Total Landings (2010): \$52.5M
	Cameron	Total Landings (2010): \$11.5M
	Delacroix-Yscloskey	Total Landings (2010): \$11.7M
	Delcambre	Total Landings (2010): \$20.7M
	Dulac-Chauvin	Total Landings (2010): \$45.1M
	Empire-Venice	Total Landings (2010): \$53.7M
	Freeport	Total Landings (2010): \$9.2M
	Galveston	Total Landings (2010): \$28.0M
	Golden Meadow-Leeville	Total Landings (2010): \$21.9M
	Grand Isle	Total Landings (2010): \$14.2M
	Gulfport-Biloxi	Total Landings (2010): \$13.0M
	Intracoastal City	Total Landings (2010): \$26.4M
	Lafitte-Barataria	Total Landings (2010): \$20.4M
	Morgan City-Berwick	Total Landings (2010): \$5.7M
	Palacios	Total Landings (2010): \$31.9M
	Pascagoula-Moss Point	Total Landings (2010): \$8.9M
	Port Arthur	Total Landings (2010): \$47.4M
Ports	There are a number of significant commercial ports in the western Gulf of Mexico 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.	
	Port Arthur, TX	1,183 port calls annually
	Freeport, TX	777 port calls annually
	Galveston, TX	699 port calls annually
	Houston, TX	6,698 port calls annually
	Texas City, TX	1,167 port calls annually
	Corpus Christi, TX	1,037 port calls annually
	Lake Charles, LA	683 port calls annually
	Galveston Lightering Area, TX	591 port calls annually
	Pascagoula, MS	562 port calls annually
	Nederland Terminal, TX	389 port calls annually
	New Orleans, LA	5,544 port calls annually
	Loop Terminal, LA	295 port calls annually
	Southwest Pass Lightering Area, LA	249 port calls annually
	Gulfport, MS	197 port calls annually
	Ingleside, TX	193 port calls annually
	Point Comfort, TX	184 port calls annually
	South Sabine Point Lightering Area, TX	118 port calls annually
	Brownsville, TX	74 port calls annually
	Beaumont, TX	64 port calls annually
	Freeport Lightering Area, TX	30 port calls annually
	Corpus Christi Lightering Area, TX	26 port calls annually
	Sabine Pass, TX	235 port calls annually

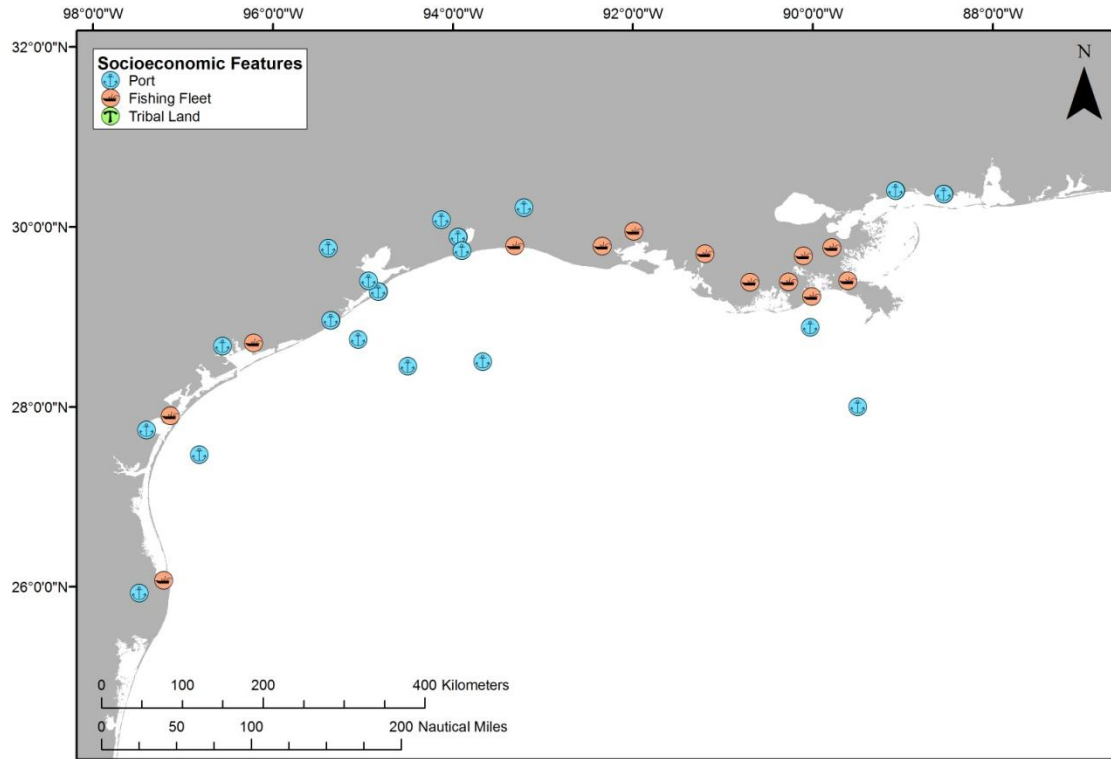


Figure 4-1: Tribal lands, ports, and commercial fishing fleets at risk from a release from the *Gulfpenn*. (Note that there are no tribal lands at risk.)

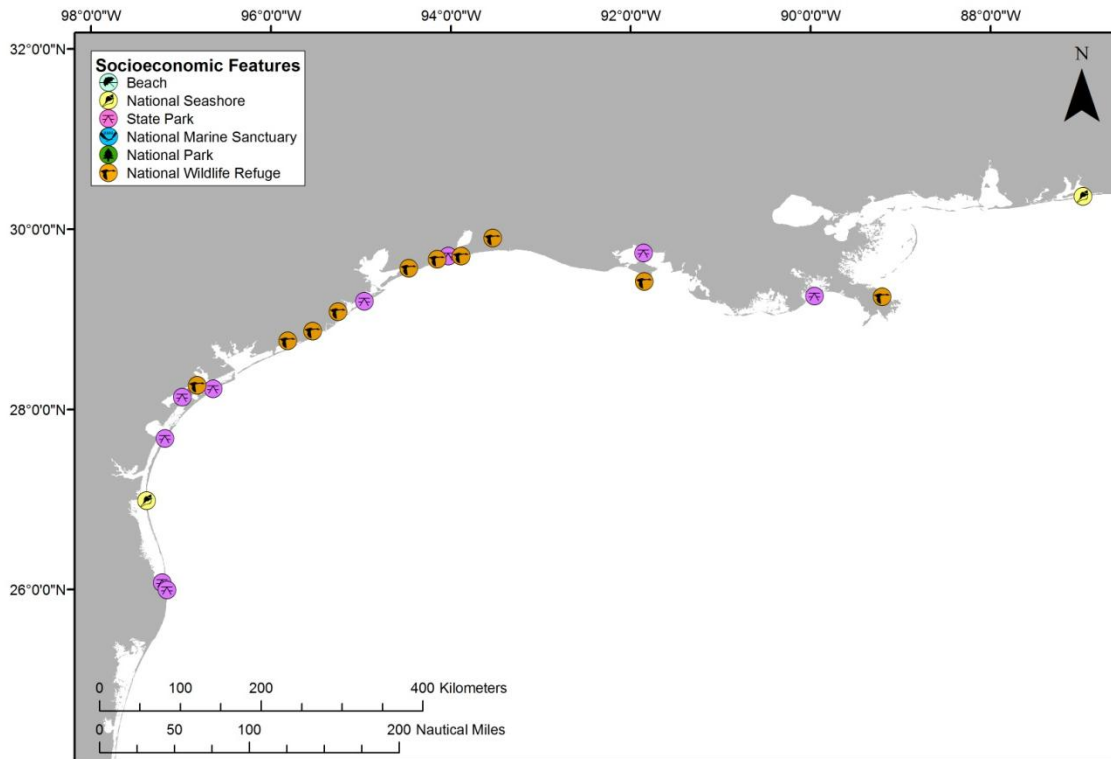


Figure 4-2: Beaches, coastal state parks, and Federal protected areas at risk from a release from the *Gulfpenn*.

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/m² for water surface impacts; and 1 g/m² 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 *Gulfpenn*, **shading** indicates the degree of risk for a WCD release of 14,000 bbl and **a border** indicates degree of risk for the Most Probable Discharge of 1,400 bbl. Please note: The probability of oiling cannot be determined using the regression curves; probability can only be determined from the 200 model runs. Thus, the modeling results and regression curves for the R.W. Gallagher are used to estimate the values used in the risk scoring for the degree of oiling only.

Risk Factor 4A-1: Water Column: Probability of Oiling of SRAR (not scored)

This risk factor reflects the probability that at least 0.2 mi² 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 mi² of the upper 33 feet of the water column at the threshold level
- **Medium Impact:** impact on 0.2 to 200 mi² of the upper 33 feet of the water column at the threshold level
- **High Impact:** impact on more than 200 mi² of the upper 33 feet of the water column at the threshold level

The *Gulfpenn* is classified as Low Risk for degree of oiling for water column socio-economic resources for the WCD of 14,000 bbl because the mean volume of water contaminated in the model runs was 0 mi² of the upper 33 feet of the water column. For the Most Probable Discharge of 1,400 bbl, the *Gulfpenn* is classified as Low Risk for degree of oiling because the mean volume of water contaminated was 0 mi² of the upper 33 feet of the water column.

Risk Factor 4B-1: Water Surface Probability of Oiling of SRAR (not scored)

This risk factor reflects the probability that at least 1,000 mi² 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/m² (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 mi² of water surface impact at the threshold level
- **Medium Impact:** 1,000 to 10,000 mi² of water surface impact at the threshold level
- **High Impact:** more than 10,000 mi² of water surface impact at the threshold level

The *Gulfpenn* is classified as Medium Risk for degree of oiling for water surface socio-economic resources for the WCD of 14,000 bbl because the mean area of water contaminated in the model runs was 5,900 mi². The *Gulfpenn* is classified as Medium Risk for degree of oiling for the Most Probable Discharge because the mean area of water contaminated was 1,700 mi².

Risk Factor 4C: Shoreline Impacts to SRAR

The impacts to different types of shorelines vary based on economic value. For the modeled wrecks, 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”). In this risk analysis for the *Gulfpenn*, shorelines have NOT been weighted by their degree of sensitivity to oiling because these data are available only for modeled vessels. Therefore, the impacts are evaluated only on the total number of shoreline miles oiled as determined from the regression curve.

Risk Factor 4C-1: Shoreline Probability of Oiling of SRAR (not scored)

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/m² (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 *Gulfpenn* is classified as Medium Risk for degree of oiling for shoreline socio-economic resources for the WCD because the mean length of shoreline contaminated in the model runs was 41 miles. The *Gulfpenn* is classified as Medium Risk for degree of oiling for shoreline socio-economic resources for the Most Probable Discharge because the mean length of shoreline contaminated was 30 miles.

Considering the modeled risk scores and the socio-economic resources at risk, the socio-economic risk from potential releases of the WCD of 14,000 bbl of heavy fuel oil from the *Gulfpenn* is summarized as listed below and indicated in the far-right column in Table 4-2:

- Water column resources – Low, because a small water column area would be impacted in important fishing grounds
- Water surface resources – Medium, because a relatively large area of offshore surface water would be impacted in busy shipping lanes. It should be noted that oil on the surface will not be continuous but rather be broken and patchy and in the form of sheens, tarballs, and streamers
- Shoreline resources – Medium, because a moderate length of shoreline would be impacted in areas that have high-value and sensitive shoreline resources, including many beach communities

Table 4-2: Socio-economic risk factor ranks for the **Worst Case Discharge of 14,000 bbl** of heavy fuel oil from the *Gulfpenn*.

Risk Factor	Risk Score			Explanation of Risk Score	Final Score
4A-1: Water Column Probability SRAR Oiling	Low	Medium	High	N/A: Only available for modeled vessels	Low
4A-2: Water Column Degree SRAR Oiling	Low	Medium	High	The mean volume of water contaminated above 1 ppb was 0 mi ² of the upper 33 feet of the water column	
4B-1: Water Surface Probability SRAR Oiling	Low	Medium	High	N/A: Only available for modeled vessels	Med
4B-2: Water Surface Degree SRAR Oiling	Low	Medium	High	The mean area of water contaminated above 0.01 g/m ² was 5,900 mi ²	
4C-1: Shoreline Probability SRAR Oiling	Low	Medium	High	N/A: Only available for modeled vessels	Med
4C-2: Shoreline Degree SRAR Oiling	Low	Medium	High	The length of shoreline contaminated by at least 1 g/m ² was 41 mi	

For the Most Probable Discharge of 1,400 bbl, the socio-economic risk from potential releases of heavy fuel oil from the *Gulfpenn* is summarized as listed below and indicated in the far-right column in Table 4-3:

- Water column resources – Low, because a small water column area would be impacted in important fishing grounds
- Water surface resources – Low, because a small offshore area would be affected in an area of important shipping lanes. It should be noted that oil on the surface will not be continuous but rather be broken and patchy and in the form of sheens, tarballs, and streamers
- Shoreline resources – Medium, because a moderate amount of shoreline would be impacted with persistent tarballs and there are a large number of potentially vulnerable socio-economic resources located along the shoreline

Table 4-3: Socio-economic risk factor ranks for the **Most Probable Discharge of 1,400 bbl** of heavy fuel oil from the *Gulfpenn*.

Risk Factor	Risk Score			Explanation of Risk Score	Final Score
4A-1: Water Column Probability SRAR Oiling	Low	Medium	High	N/A: Only available for modeled vessels	Low
4A-2: Water Column Degree SRAR Oiling	Low	Medium	High	The mean volume of water contaminated above 1 ppb was 0 mi ² of the upper 33 feet of the water column	
4B-1: Water Surface Probability SRAR Oiling	Low	Medium	High	N/A: Only available for modeled vessels	Low
4B-2: Water Surface Degree SRAR Oiling	Low	Medium	High	The mean area of water contaminated above 0.01 g/m ² was 1,700 mi ²	
4C-1: Shoreline Probability SRAR Oiling	Low	Medium	High	N/A: Only available for modeled vessels	Med
4C-2: Shoreline Degree SRAR Oiling	Low	Medium	High	The length of shoreline contaminated by at least 1 g/m ² was 30 mi	

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

The overall risk assessment for the *Gulfpenn* 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 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. As noted in Sections 3 and 4, each of 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. Please note: The probability of oiling cannot be determined using the regression curves; probability can only be determined from the 200 model runs. Thus, the modeling results and regression curves for the *R.W. Gallagher* were used to estimate the values used in the risk scoring for the **degree of oiling only**.

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, *Gulfpenn* scores Medium with 12 points; for the Most Probable Discharge, *Gulfpenn* scores Low with 10 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 *Gulfpenn*. Archaeologists with BOEM and BSEE should be contacted for more information based on their surveys of the wreck site. The final determination of what type of action, if any, rests with the U.S. Coast Guard.

<i>Gulfpenn</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 commercial fishermen who frequent the area, to gain awareness of changes in the site

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

Vessel Risk Factors		Data Quality Score	Comments	Risk Score	
Pollution Potential Factors	A1: Oil Volume (total bbl)	Medium	Maximum of 13,374 bbl, not reported to be leaking	Med	
	A2: Oil Type	High	Bunker fuel is heavy fuel oil, a Group IV oil type		
	B: Wreck Clearance	High	Vessel not reported as cleared		
	C1: Burning of the Ship	High	No fire was reported		
	C2: Oil on Water	High	No oil was reported on the water		
	D1: Nature of Casualty	High	One torpedo detonation		
	D2: Structural Breakup	High	Vessel remains in one contiguous piece		
Archaeological Assessment	Archaeological Assessment	High	Detailed sinking records and site reports of this ship exist, assessment is believed to be very accurate	Not Scored	
Operational Factors	Wreck Orientation	High	Upright	Not Scored	
	Depth	High	1,820 ft		
	Visual or Remote Sensing Confirmation of Site Condition	High	Location has been surveyed		
	Other Hazardous Materials Onboard	High	No		
	Munitions Onboard	High	No		
	Gravesite (Civilian/Military)	High	Yes		
	Historical Protection Eligibility (NHPA/SMCA)	High	NHPA and possibly SMCA		
				WCD	Most Probable
Ecological Resources	3A: Water Column Resources	High	Area affected above thresholds are relatively small and offshore where sensitive resources are less concentrated	Low	Low
	3B: Water Surface Resources	High	Heavy fuel oil forms persistent tarballs that can travel long distances posing risks to birds and sea turtles, esp. when concentrated in convergence zones and <i>Sargassum</i>	Med	Med
	3C: Shore Resources	High	Persistent tarballs strand on beaches and marshes, fouling habitats and animals	Med	Low
Socio-Economic Resources	4A: Water Column Resources	High	Moderate area of water column would be impacted in important fishing grounds	Low	Low
	4B: Water Surface Resources	High	Relatively large area of offshore surface water impacted in busy shipping lanes	Med	Low
	4C: Shore Resources	High	Moderate length of shoreline would be impacted in areas that have high-value and sensitive shoreline resources, including many beach communities	Med	Med
Summary Risk Scores				12	10