Office of National Marine Sanctuaries
Office of Response and Restoration

Screening Level Risk Assessment Package

Monrovia

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National Oceanic and
Atmospheric Administration

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Photo: Photograph of *Monrovia*
Source: http://www.abouthegreatlakes.com/era.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.

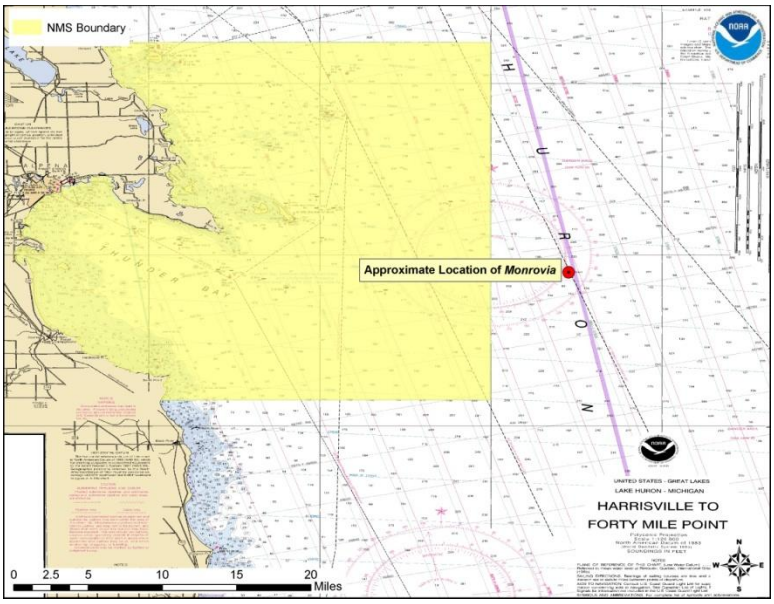
The potential polluting shipwrecks were identified through searching a broad variety of historical sources. NOAA then worked with Research Planning, Inc., RPS ASA, and Environmental Research Consulting to conduct the modeling forecasts, and the ecological and environmental resources at risk assessments.

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: *Monrovia*

The freighter *Monrovia*, sunk after a collision outside Thunder Bay in Lake Huron in 1959, 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 *Monrovia*, 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, *Monrovia* scores Medium with 12 points; for the Most Probable Discharge (10% of the Worse Case volume), *Monrovia* scores Low with 10 points. Given these scores, and the higher level of data certainty, NOAA recommends that this site be noted in Area Contingency Plans and so that if a mystery spill is reported in the general area, this vessel could be investigated as a source. It could be considered for an assessment if the resources at risk are underrepresented in this assessment. At a minimum, an active monitoring program should be implemented. Outreach efforts with the technical and recreational dive community as well as commercial and recreational fishermen who frequent the area would be helpful to gain awareness of localized spills 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		
	D2: Structural Breakup		
Archaeological Assessment	Archaeological Assessment	Not Scored	
Operational Factors	Wreck Orientation	Not Scored	
	Depth		
	Confirmation of Site Condition		
	Other Hazardous Materials		
	Munitions Onboard		
	Gravesite (Civilian/Military)		
	Historical Protection Eligibility		
		WCD	MP (10%)
Ecological Resources	3A: Water Column Resources	Low	Low
	3B: Water Surface Resources	Med	Low
	3C: Shore Resources	Med	Med
Socio-Economic Resources	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 37.

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

Vessel Particulars

Official Name: *Monrovia*

Official Number: 169502

Vessel Type: Freighter

Vessel Class: Empire Class Freighter

Former Names: *Empire Falstaff*; *Commandant Mantelet*; *Commandant LeBiboul*

Year Built: 1943

Builder: Lithgows Ltd., Glasgow, Scotland

Builder's Hull Number: Unknown

Flag: Liberian

Owner at Loss: Eastern Shipping Corporation of Monrovia, Liberia

Controlled by: Unknown **Chartered to:** Unknown

Operated by: Unknown

Homeport: Monrovia, Liberia

Length: 447 feet 7 inches **Beam:** 56 feet 2 inches **Depth:** 26 feet 3 inches

Gross Tonnage: 6,674 **Net Tonnage:** 4,248

Hull Material: Steel **Hull Fastenings:** Riveted **Powered by:** Oil-fired Steam

Bunker Type: Heavy fuel oil (Bunker C) **Bunker Capacity (bbl):** Unknown

Average Bunker Consumption (bbl) per 24 hours: Unknown

Liquid Cargo Capacity (bbl): Unknown **Dry Cargo Capacity:** Unknown

Tank or Hold Description: Unknown

Casualty Information

Port Departed: Montreal, Canada

Destination Port: Chicago, IL

Date Departed: June 16, 1959

Date Lost: June 25, 1959

Number of Days Sailing: ≈ 10

Cause of Sinking: Collision

Latitude (DD): 44.9837

Longitude (DD): -82.923

Nautical Miles to Shore:

Nautical Miles to NMS:

Nautical Miles to MPA:

Nautical Miles to Fisheries:

Approximate Water Depth (Ft): 140

Bottom Type: Lake bottom

Is There a Wreck at This Location? Yes, wreck has been positively identified

Wreck Orientation: Resting on an even keel

Vessel Armament: None

Cargo Carried when Lost: 4,000 tons of sheet and bar steel loaded in Antwerp, Belgum

Cargo Oil Carried (bbl): 0

Cargo Oil Type: N/A

Probable Fuel Oil Remaining (bbl): 1,190

Fuel Type: Heavy fuel oil (Bunker C)

Total Oil Carried (bbl): 1,190

Dangerous Cargo or Munitions: None

Munitions Carried: None

Demolished after Sinking: Yes, partially dynamited for cargo salvage

Salvaged: Yes, partially

Cargo Lost: No

Reportedly Leaking: No

Historically Significant: Yes, potentially

Gravesite: No

Salvage Owner: Not known if any

Wreck Location

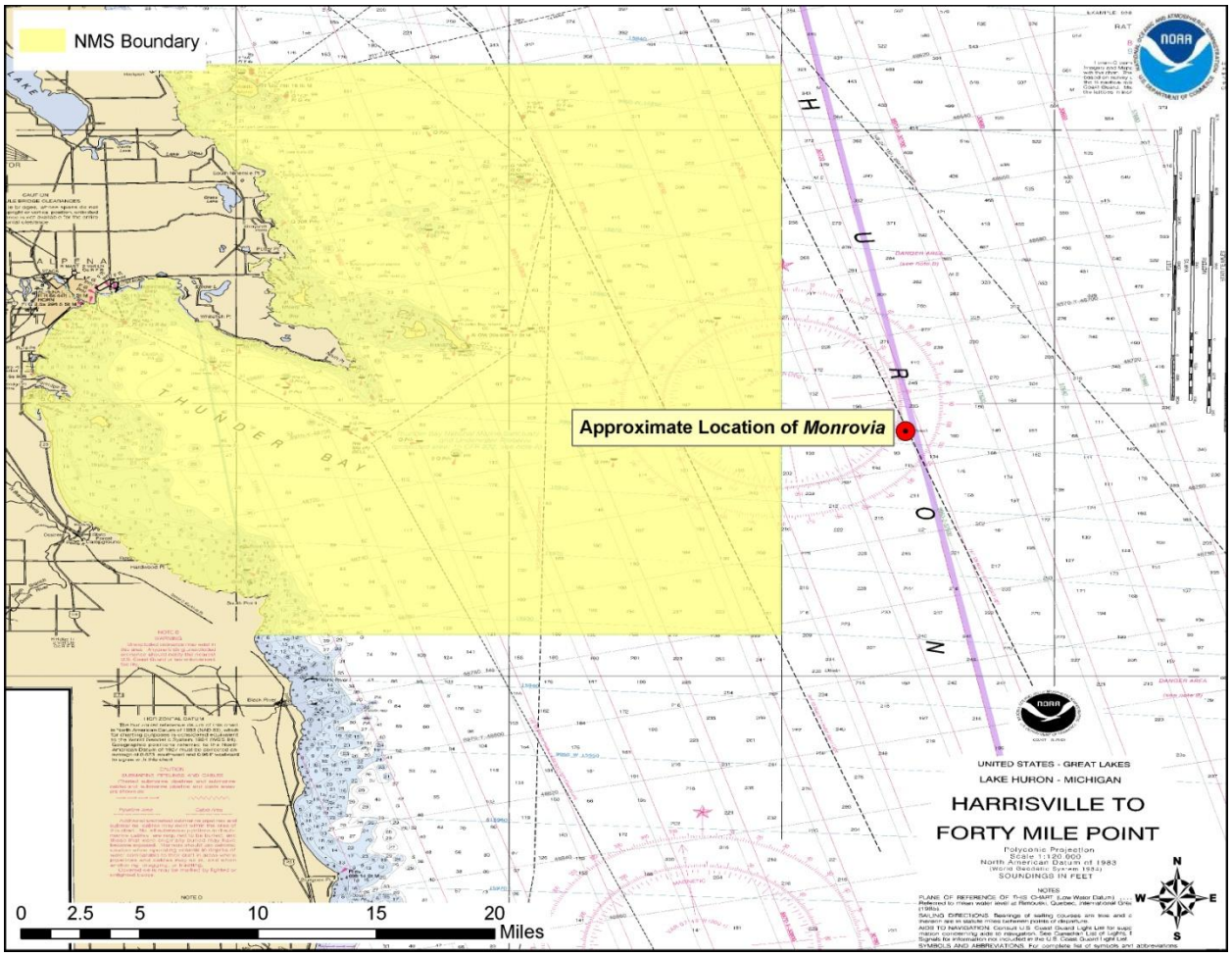


Chart Number: 14864

Casualty Narrative

"A collision between the Canadian steamer ROYALTON and the Liberian freighter MONROVIA resulted in the first sinking of the Seaway era. The accident occurred on Lake Huron June 25, L959. MONROVIA was owned by the Eastern Shipping Co., and sailed under her fourth name. The vessel had been built by Lithgows Ltd., at Glasgow, Scotland, and launched in June 1943 as EMPIRE FALSTAFF. The vessel was one of many general cargo freighters built for use in the war effort by the British Ministry of Shipping.

The 136.4 metre (447'7") vessel was steam powered and carried cargoes in the 10,000 ton range. She was sold to private interests and renamed COMMANDANT MANTELET in 1945 and COMMANDANT LE BIBOUL in 1951. She became MONROVIA in 1954.

MONROVIA'S last voyage began in Antwerp, Belgium, where a cargo of steel was taken on board. The vessel crossed the Atlantic and headed up the Seaway for the first, and last time enroute to Duluth, Minn. The voyage was interrupted by fog on Lake Huron. MONROVIA apparently wandered off course as she

groped through the thick mist and crossed in front of the downbound Canadian bulk carrier ROYALTON at 1405 hours. The latter inflicted major damage below the waterline on the port side and MONROVIA began to take on water in most cargo holds and the engine room. Within hours she sank in 42.7 metres (140') of water. All of the 29 crew members were picked up by the NORMAN W. FOY. MONROVIA came to rest upright and intact on the bottom of the lake. Due to the depth and the extent of damage, refloating the ship was not considered economically feasible. But some of the cargo of steel was removed with salvage work continuing into the 1970's.

ROYALTON, a member of the Misener fleet, received bow damage but remained afloat. This vessel was hauling 410,000 bushels of grain from Duluth to Montreal and was able to continue her voyage. After unloading, the ship went to dry dock for repairs.

ROYALTON had been built at Collingwood, Ontario, and launched August 9, 1924. The 167.6 metre (550'5) long bulk carrier hauled ore, grain and coal for most of her career and operated until September 11, 1979. The ship was sold to Marine Salvage for scrap and resold to Italian interests. She arrived at La Spezia, Italy, June 25, 1980, and dismantling of the hull took place in the months ahead."
-http://www.abouthegreatlakes.com/era.html

General Notes

None found in database.

Wreck Condition/Salvage History

"Despite improved charts, navigational aids, designated shipping lanes, radio telephones, and even radar, big ships still go down in the Great Lakes. Such was the case when the Liberian registered ocean freighter *Monrovia* was rammed by the freighter *Royalton* during a heavy fog just outside Thunder Bay. *Monrovia* went to the bottom in deep water. The wreck sits upright on the lake bottom and is largely intact except for the collision damage."
-http://thunderbay.noaa.gov/shipwrecks/monrovia.html

Archaeological Assessment

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

Where the current condition of a shipwreck is not known, data from other archaeological studies of similar types of shipwrecks provide the means for brief explanations of what the shipwreck might look like and specifically, whether it is thought there is sufficient structural integrity to retain oil. This is more subjective than the Pollution Potential Tree and computer-generated resource at risk models, and as such provides an additional viewpoint to examine risk assessments and assess the threat posed by these shipwrecks. It also addresses questions of historical significance and the relevant historic preservation laws and regulations that will govern on-site assessments.

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

Assessment

Since *Monrovia* sank in 1959, records relating to the loss of the vessel were not part of the National Archives record groups examined by NOAA archaeologists. The local U.S. Coast Guard District or Sector may have access to more records about this wreck than are available at the National Archives. This means that the best assessment on the sinking of the ship probably still comes from the U.S. Coast Guard's Marine Board of Investigation Report written about this vessel and other reports readily accessible online.

Although it is not know if any oil currently remains inside this wreck, the proximity of the wreck to Thunder Bay National Marine Sanctuary has generated increased interest in the shipwreck. This is especially the case since local archaeologists located an article in the Alpena News stating:

> At 9th Coast Guard District headquarters in Cleveland, Captain N.H. McGarity (who had previously worked on the sinking of the *Monrovia*) combed 276 pages of testimony from the hearing which followed the sinking and could find no clue as to how much oil there was aboard the ship. McGarity said that it was probably overlooked during the hearing because, "In 1959 the U.S. Coast Guard wasn't really concerned with water pollution." McGarity further stated that an attempt had been made several years ago to contact members of the Greek crew who had served in the engine room of the *Monrovia*. This search proved to be futile, McGarity himself estimated that, based on his experience, there would have been less than 50,000 gallons of fuel on the vessel when it went down. He said that most ships entering the Great Lakes from foreign ports-of-call wait until they are ready to return to Europe before taking on oil. This allows them to take maximum advantage of low fuel prices (6-7c per gallon) charged in the U.S. (The Alpena News, Friday 2/6/1970: 1, cols. 1-3 and page 2, cols. 6-7).

Although the wreck was partially dynamited during salvage operations and rests upright on the bottom, which is an orientation that often leads to the loss of oil from vents and piping long before loss of structural integrity from corrosion or other physical impacts, the cold waters of Lake Huron may have prevented the heavy bunker oil from escaping.

If the U.S. Coast Guard does decide to assess this vessel, it should be noted that the ship may be of historic significance and will require appropriate actions be taken 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 archaeologists with the State of Michigan and Thunder Bay National Marine Sanctuary should be consulted to ensure compliance with archaeological standards for assessing a historic resource.

Background Information References

Vessel Image Sources: http://www.abouthegreatlakes.com/era.html

Construction Diagrams or Plans in RULET Database? No

Text References:

United States Coast Guard
Commandant's Action on Marine Board of Investigation; Collision Between the SS MONROVIA (Liberian) and the SS ROYALTON (Canadian), Lake Huron, 25 June 1959.
Retrieved from:
https://docs.google.com/a/noaa.gov/viewer?a=v&q=cache:UdGlpGyebLYJ:greatlakeshistory.homestead.com/files/monrovia.pdf+&hl=en&gl=us&pid=bl&srcid=ADGEESgtIlvuUMLYe582JtduvHMC_oG_AZnTt_MSNLB0kyKihoeaj2XCPYzI4CK-dciB0zz9CnI679U61aBQTB39GCiyr5BtrniMhioZGAe8Mls2pcpXLxm9aL0adj28yI17BJimHVt0&sig=AHIEtbTs_rE7bQpZzZR1mDItP4SY9a2A9w

http://thunderbay.noaa.gov/shipwrecks/monrovia.html

http://www.abouthegreatlakes.com/era.html

http://www.boatnerd.com/swayze/shipwreck/m.htm

Vessel Risk Factors

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

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 1-1.

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

Pollution Potential Tree

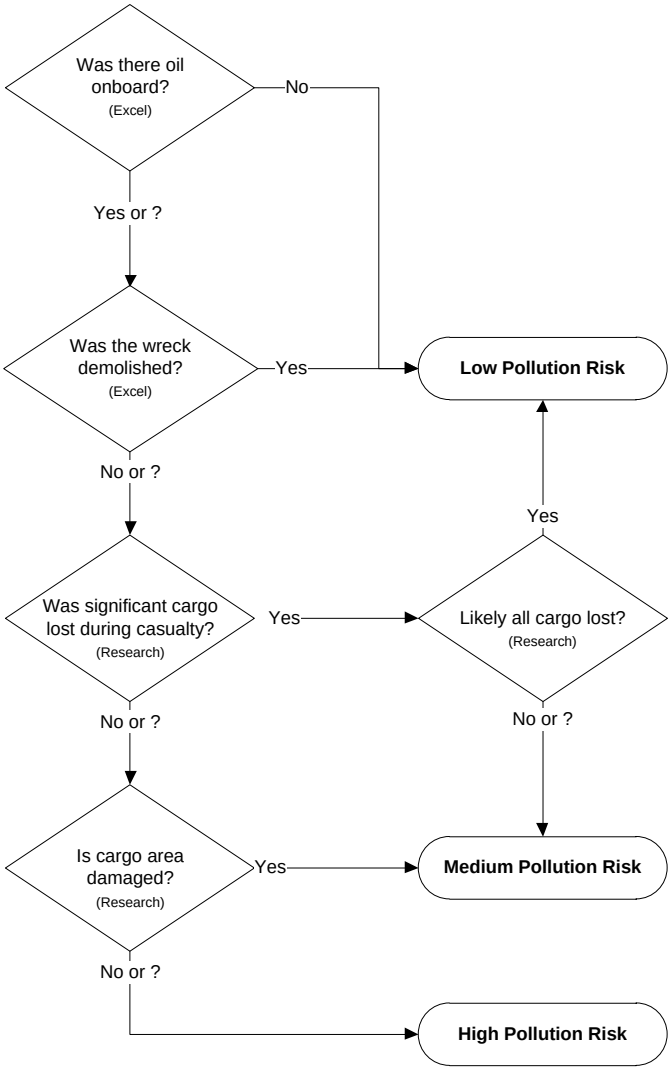


Figure 1-1: U.S. Coast Guard Salvage Engineering Response Team (SERT) developed the above Pollution Potential Decision Tree.

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 *Monrovia* 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 *Monrovia i*s ranked as Medium Volume because it is thought to have a potential for up to 1,190 bbl (based on a U.S. Coast Guard historic assessment conducted in 1970), although some of that may have been lost 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 *Monrovia*.

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 grouping[1]. (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 *Monrovia* is classified as High Risk because the bunker oil 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

[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]

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 *Monrovia* is classified as Medium Risk because dynamite was used on the wreck during salvage operations. Data quality is high.

Was significant cargo or bunker lost during casualty?

Risk Factor C1: Burning of the Ship

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

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

The *Monrovia* 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 *Monrovia* is classified as High Risk because no oil is known to have been reported spreading across the water as the vessel went down. Data quality is low because complete sinking reports were not located.

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 *Monrovia* is classified as High Risk because it sank as a result of a collision. 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 *Monrovia* is classified as High Risk because it is not broken apart and remains as 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 *Monrovia* is resting in an upright orientation. 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 *Monrovia* is 140 feet deep. Data quality is high.

Visual or Remote Sensing Confirmation of Site Condition

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

The location of the *Monrovia* is a popular dive site. Data quality is high.

Other Hazardous (Non-Oil) Cargo on Board
This factor addresses hazardous cargo other than oil that may be on board the vessel and could potentially be released, causing impacts to ecological and socio-economic resources at risk.

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

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

The *Monrovia* 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 *Monrovia.* Operational factors are listed but do not have a risk score.

Table 1-1: Summary matrix for the vessel risk factors for the *Monrovia* 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 1,191 bbl, not reported to be leaking	**Med**
	A2: Oil Type	High	Bunker oil is heavy fuel oil, a Group IV oil type	
	B: Wreck Clearance	High	Vessel partially dynamited	
	C1: Burning of the Ship	High	No fire was reported	
	C2: Oil on Water	Low	No oil was reported on the water	
	D1: Nature of Casualty	High	Collision	
	D2: Structural Breakup	High	Vessel remains as one contiguous piece	
Archaeological Assessment	Archaeological Assessment	High	Partial sinking records were located and detailed site reports exist, the assessment is believed to be very accurate	**Not Scored**
Operational Factors	Wreck Orientation	High	Upright	**Not Scored**
	Depth	High	140 ft	
	Visual or Remote Sensing Confirmation of Site Condition	High	Location is a popular dive site	
	Other Hazardous Materials Onboard	High	No	
	Munitions Onboard	High	No	
	Gravesite (Civilian/Military)	High	No	
	Historical Protection Eligibility (NHPA/SMCA)	High	NHPA	

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 oil and bunkers present on the vessel. In the case of the *Monrovia* this would be about 2,000 bbl (rounded up from 1,191 bbl) based on current estimates of the amount of oil remaining onboard the wreck.

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

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

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

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

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

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

For the large and WCD scenarios, the duration of the release was assumed to be 12 hours, envisioning a storm scenario where the wreck is damaged or broken up, and the model simulations were run for a period of 30 days. The releases were assumed to be from a depth between 2-3 meters above the sea floor, using the information known about the wreck location and depth.

It is important to acknowledge that these scenarios are only for this screening-level assessment. Detailed site/vessel/and seasonally specific modeling would need to be conducted prior to any intervention on a specific wreck.

Oil Type for Release

The *Monrovia* contained a maximum of 2,000 bbl of heavy fuel oil (a Group IV oil). Thus, the oil spill model was run using heavy fuel oil.

Oil Thickness Thresholds

The model results are reported for different oil thickness thresholds, based on the amount of oil on the water surface or shoreline and the resources potentially at risk. Table 2-2 shows the terminology and thicknesses used in this report, for both oil thickness on water and the shoreline. For oil on the water surface, a thickness of 0.01 g/m^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/m^2 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 2-2b shows the number of tarballs per m^2 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 *Monrovia* will be determined by the volume of leakage. Because oil from sunken vessels will be released at low pressures, the droplet sizes will be large enough for the oil to float to the surface. Therefore, impacts to water column resources will result from the natural dispersion of the floating oil slicks on the surface, which is limited to about the top 33 feet. The metric used for ranking impacts to the water column is the area of water surface in mi^2 that has been contaminated by 1 part per billion (ppb) oil to a depth of 33 feet. At 1 ppb, there are likely to be impacts to sensitive organisms in the water column and potential tainting of seafood, so this concentration is used as a screening threshold for both the ecological and socio-economic risk factors for water column resource impacts. To assist planners in understanding the scale of potential impacts for different leakage volumes, a regression curve was generated for the water column volume oiled using the five volume scenarios, which is shown in Figure 2-1. Using this figure, the water column impacts can be estimated for any spill volume.

[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. of the Interior, Washington, DC.

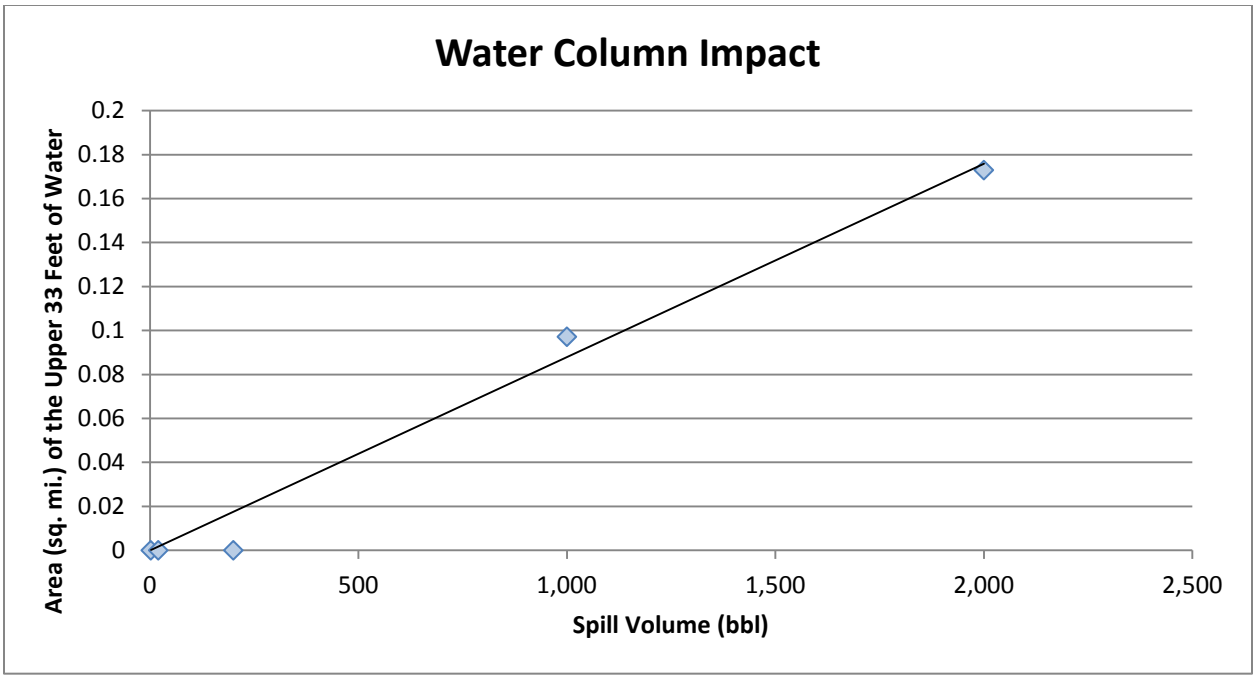


Figure 2-1: Regression curve for estimating the volume of water column at or above 1 ppb aromatics impacted as a function of spill volume for the *Monrovia*.

Potential Water Surface Slick

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

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

Scenario Type	Oil Volume (bbl)	Estimated Slick Area Swept Mean of All Models	
		0.01 g/m^2	10 g/m^2
Chronic	2	45 mi^2	45 mi^2
Episodic	20	174 mi^2	174 mi^2
Most Probable	200	560 mi^2	560 mi^2
Large	1,000	1,400 mi^2	1,400 mi^2
Worst Case Discharge	2,000	1,840 mi^2	1,840 mi^2

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

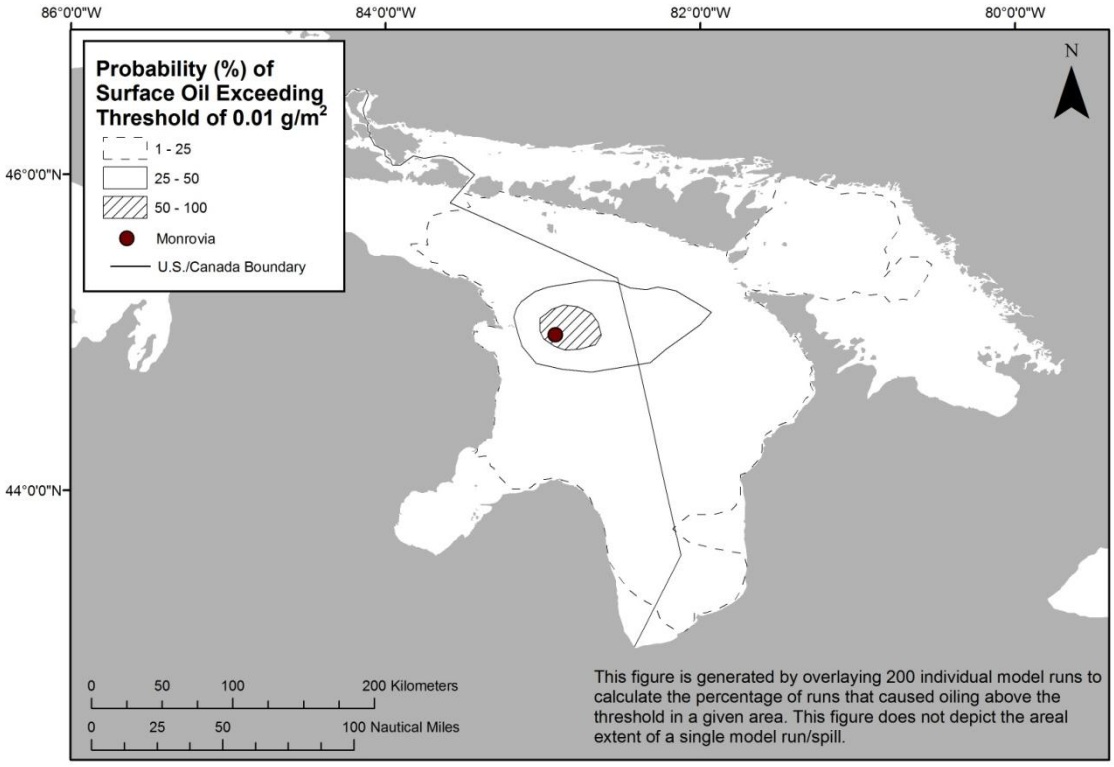


Figure 2-2: Probability of surface oil (exceeding 0.01 g/m^2) from the Most Probable spill of 200 bbl of heavy fuel oil from the *Monrovia* at the threshold for socio-economic resources at risk.

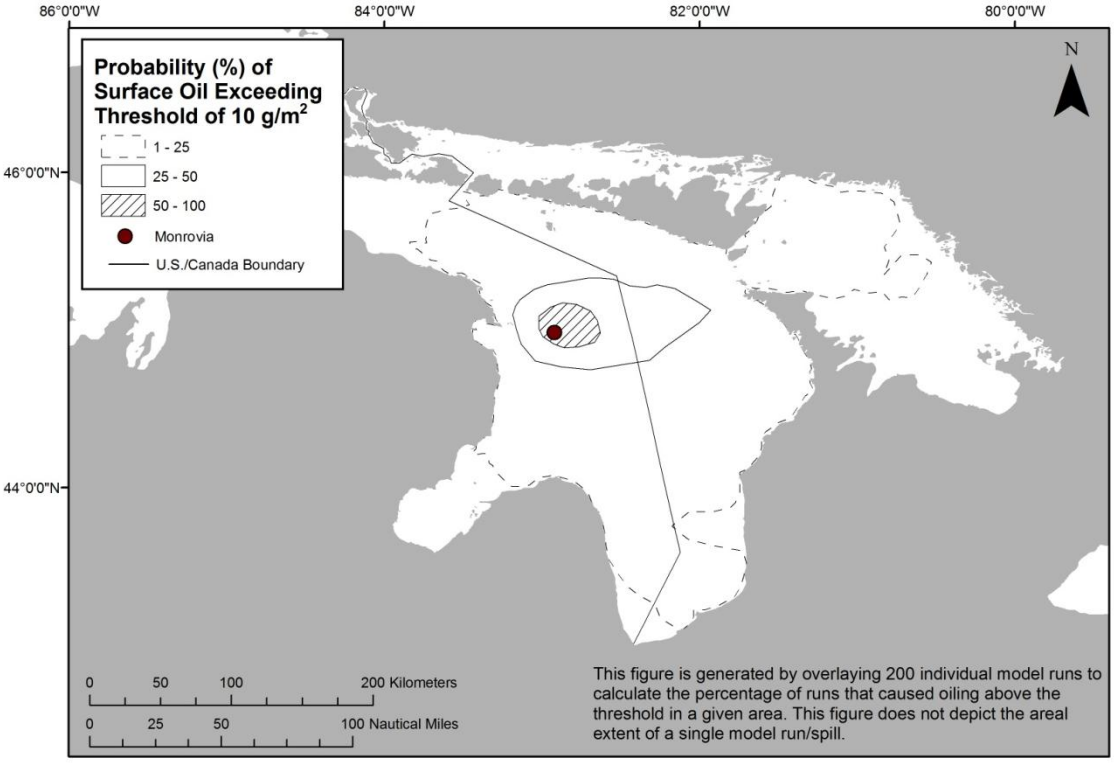


Figure 2-3: Probability of surface oil (exceeding 10 g/m^2) from the Most Probable spill of 200 bbl of heavy fuel oil from the *Monrovia* at the threshold for ecological resources at risk.

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

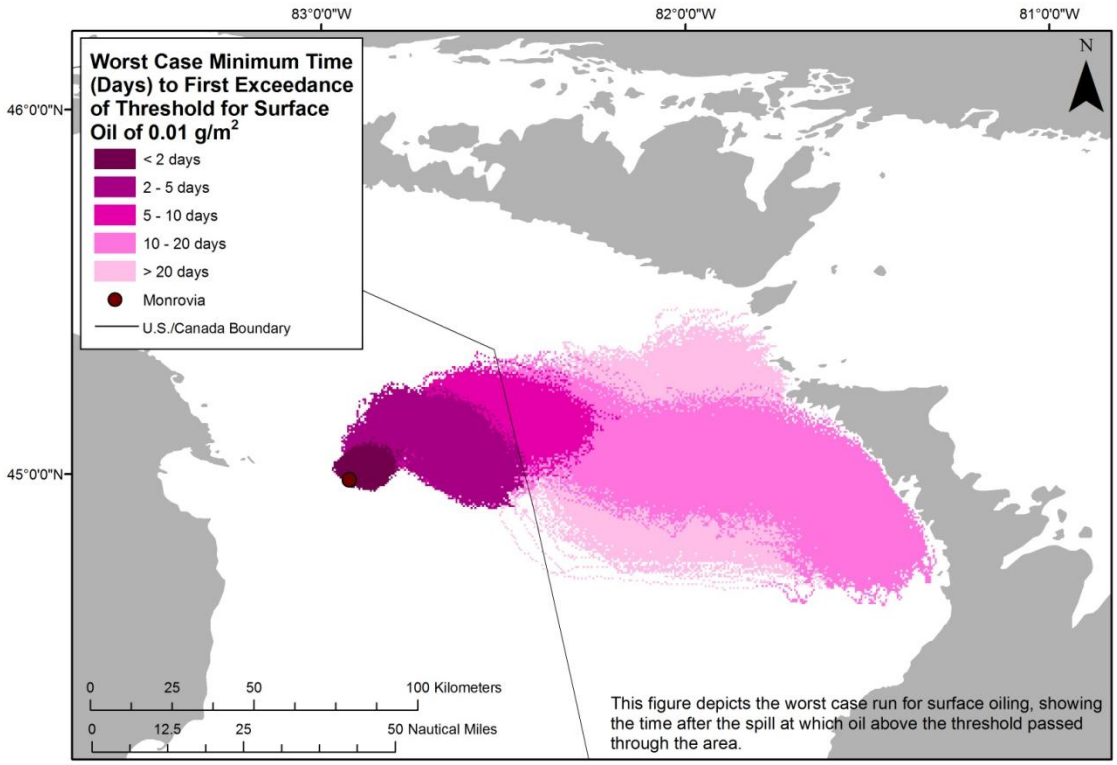


Figure 2-4: Water surface oiling from the Most Probable spill of 200 bbl of heavy fuel oil from the *Monrovia* shown as the area over which the oil spreads at different time intervals.

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

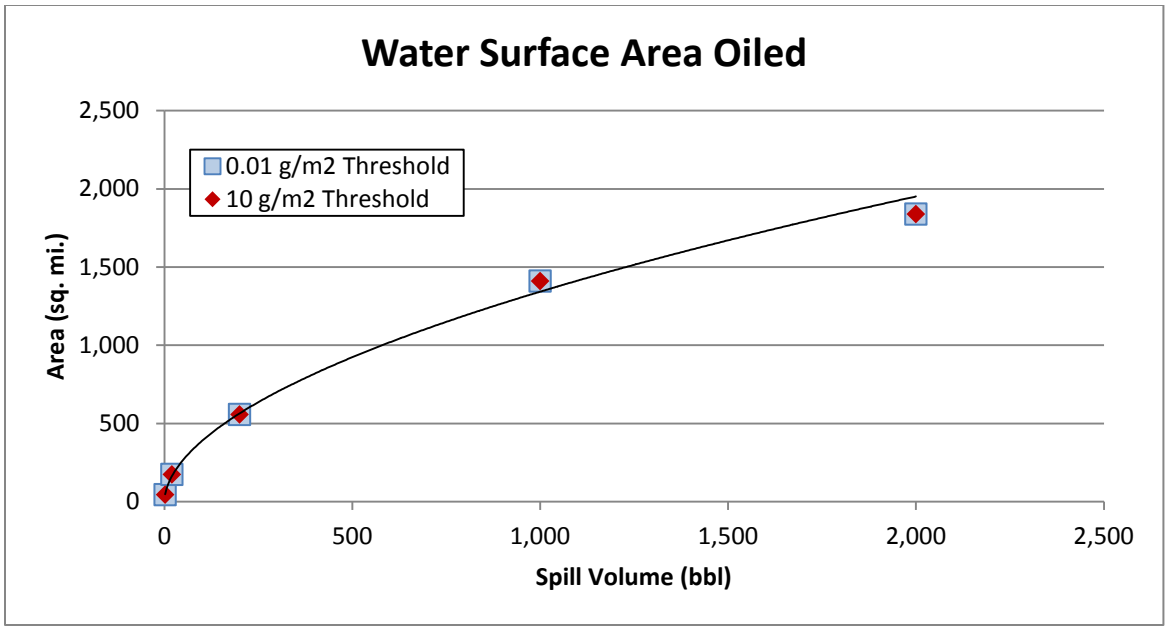


Figure 2-5: Regression curve for estimating the amount of water surface oiling as a function of spill volume for the *Monrovia*, showing both the ecological threshold of 10 g/m^2 and socio-economic threshold of 0.01 g/m^2. The curves are so similar that they plot on top of each other.

Potential Shoreline Impacts

Based on these modeling results, most of the shorelines along Lake Huron are at risk. Figure 2-6 shows the probability of oil stranding on the shoreline at concentrations that exceed the socio-economic threshold of 1 g/m^2, for the Most Probable release of 200 bbl. However, the specific areas that would be oiled will depend on the currents and winds at the time of the oil release(s), as well as on the amount of oil released. Figure 2-7 shows the single oil spill scenario that resulted in the maximum extent of shoreline oiling for the Most Probable volume. Table 2-4 shows the estimated miles of shoreline oiling above the threshold of 1 g/m^2 by scenario type.

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

Scenario Type	Volume (bbl)	Estimated Miles of Shoreline Oiling Above 1 g/m^2			
		Rock/Gravel/Artificial	Sand	Wetland/Mudflat	Total
Chronic	2	5	2	0	6
Episodic	20	16	6	0	22
Most Probable	200	21	7	0	29
Large	1,000	7	1	0	9
Worst Case Discharge	2,000	22	7	1	30

Table 2-4a: Estimated shoreline oiling from leakage from the *Monrovia*. (U.S. only).

Scenario Type	Volume (bbl)	Estimated Miles of Shoreline Oiling Above 1 g/m^2			
		Rock/Gravel/Artificial	Sand	Wetland/Mudflat	Total
Chronic	2	2	1	0	2
Episodic	20	5	2	0	7
Most Probable	200	6	3	0	9
Large	1,000	2	1	0	3
Worst Case Discharge	2,000	6	3	1	9

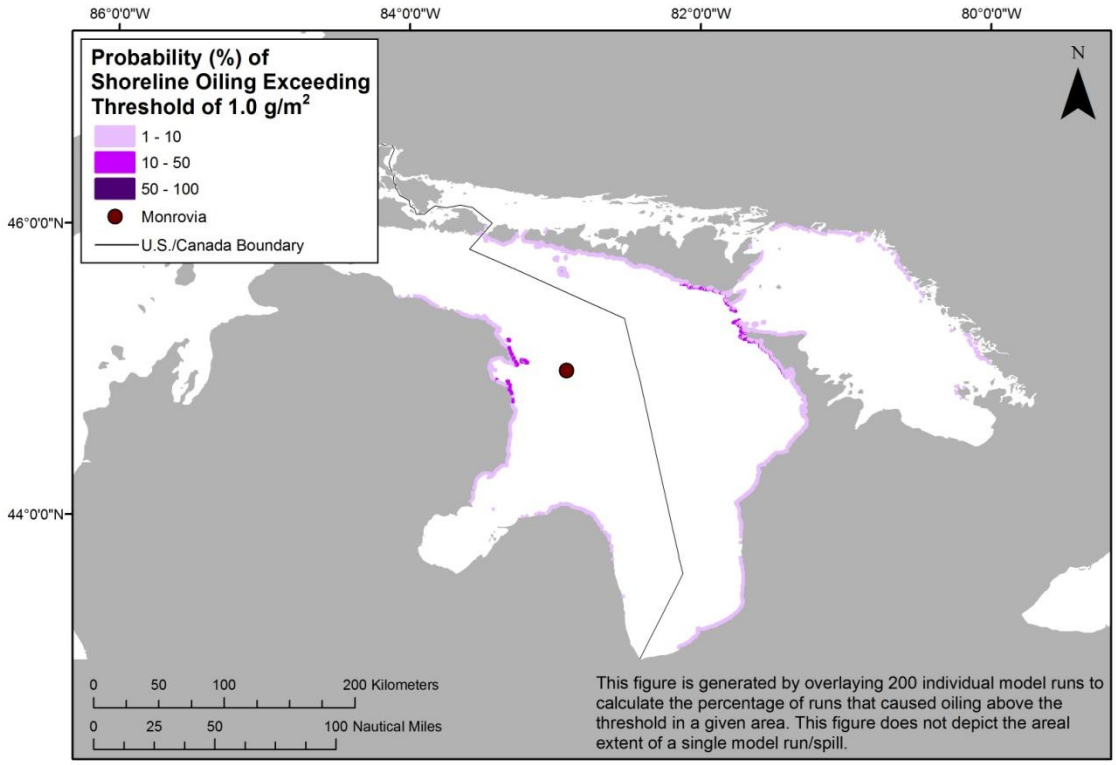


Figure 2-6: Probability of shoreline oiling (exceeding 1.0 g/m^2) from the Most Probable Discharge of 200 bbl of heavy fuel oil from the *Monrovia*.

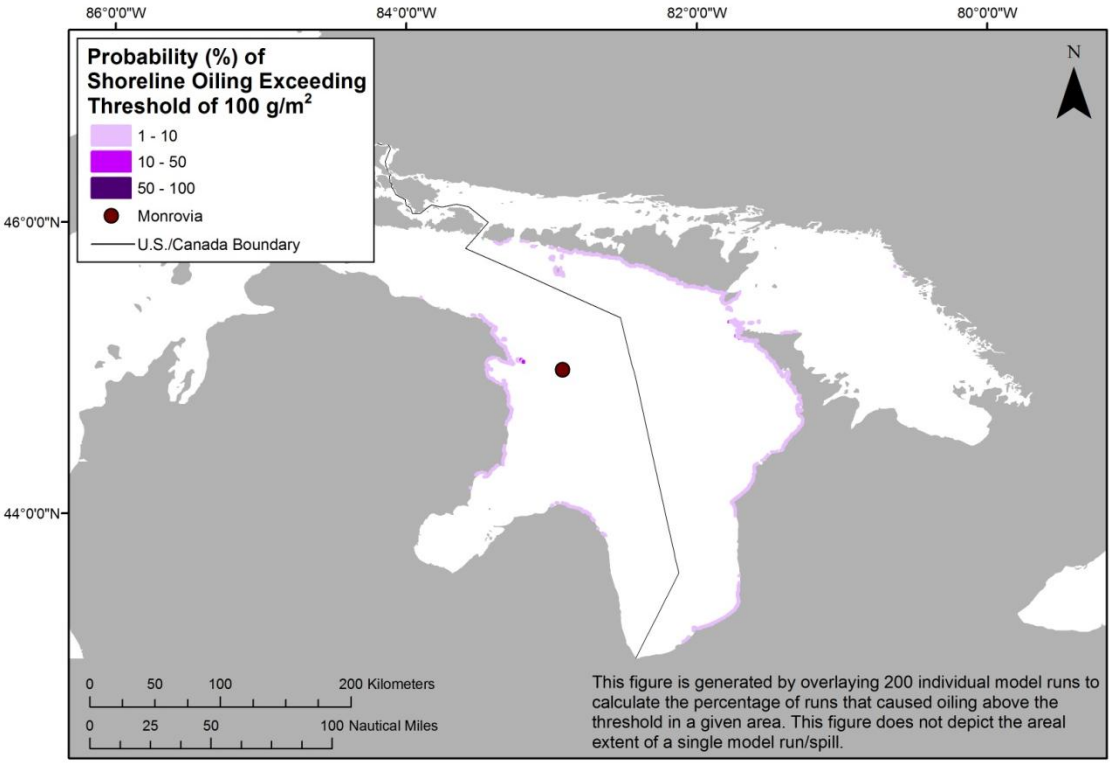


Figure 2-7: The extent and degree of shoreline oiling from the single model run of the Most Probable Discharge of 200 bbl of heavy fuel oil from the *Monrovia* that resulted in the greatest shoreline oiling.

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 shoreline length oiled using the five volume scenarios. Using Figure 2-8, the shore length oiled can be estimated for any spill volume.

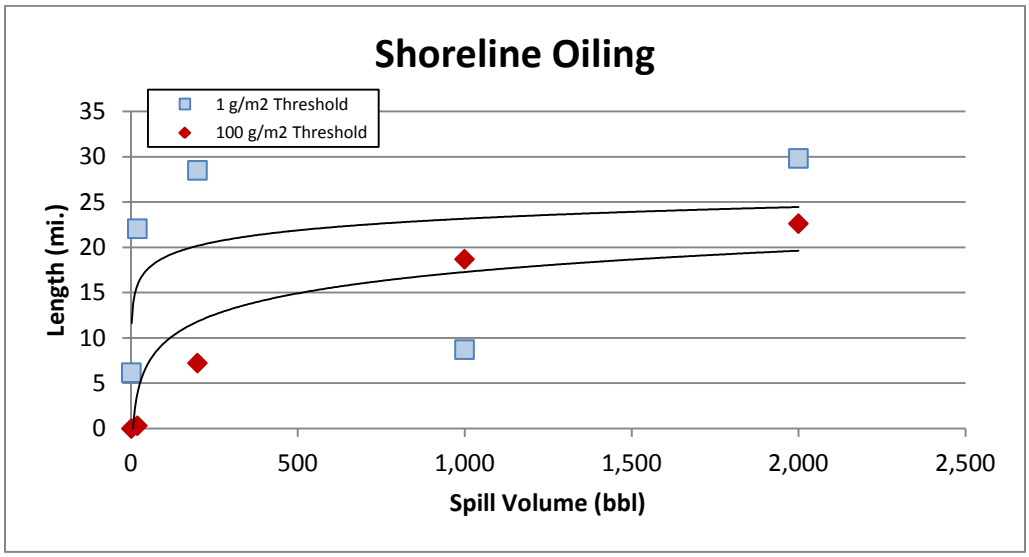


Figure 2-8: Regression curve for estimating the amount of shoreline oiling at different thresholds as a function of spill volume for the *Monrovia*[3].

The worst case scenario for shoreline exposure along the potentially impacted area for the WCD volume (Table 2-5) and the Most Probable volume (Table 2-6) consists primarily of artificial shorelines and sand beaches. Marshes and flats are also at risk.

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

Shoreline/Habitat Type	Lighter Oiling Oil Thickness <1 mm Oil Thickness >1 g/m²	Heavier Oiling Oil Thickness >1 mm Oil Thickness >100 g/m²
Rocky and artificial shores/Gravel beaches	26 miles	22 miles
Sand beaches	11miles	9 miles
Marshes and flats	5 miles	0 miles

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

Shoreline/Habitat Type	Lighter Oiling Oil Thickness <1 mm Oil Thickness >1 g/m²	Heavier Oiling Oil Thickness >1 mm Oil Thickness >100 g/m²
Rocky and artificial shores/Gravel beaches	24 miles	8 miles
Sand beaches	11 miles	2 miles
Salt marshes and tidal flats	2 miles	0 miles

[3] Although these results appear inconsistent, they are attributable to the random processes in the model. For this particular case, many of the individual 200 runs had shoreline oiling impacts to only one shore type (e.g., sandy beach, rocky shore). As a result, when calculating the average impact by shore type for the runs that hit shore, there are numerous zeros for each shore type that pull down the average.

SECTION 3: ECOLOGICAL RESOURCES AT RISK

Ecological resources at risk from a catastrophic release of oil from the *Monrovia* (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. Mudflats and wetlands in the area of impact are important stopovers for migratory shorebirds, waterfowl, and raptors. Nearshore lake waters are spawning habitat for ecologically and economically important fish, many of which have already suffered declines in abundance due to predation by invasive species and lakeside development.

Table 3-1: Ecological resources at risk from a release of oil from the *Monrovia*.
(FT = Federal threatened; FE = Federal endangered; ST = State threatened; SE = State endangered).

Species Group	Species Subgroup and Geography	Seasonal Presence

Birds	Lake Huron shoreline and nearshore habitats are significant nesting locations and migratory stopovers for shorebirds, and migratory and wintering habitat for waterfowl
	• Common gull/tern species include the Caspian tern (ST), black tern, common tern (ST), Forster's tern (ST), ring-billed gull, herring gull
	• Shorebird species present include killdeer, greater and lesser yellowlegs, spotted sandpiper, ruddy turnstone, black bellied plover
	• Common waterfowl include common merganser, red-breasted merganser, American bittern, American wigeon, black duck, blue-winged teal, bufflehead, canvasback, common goldeneye, gadwall, greater scaup, green-winged teal, hooded merganser, horned grebe, lesser scaup, mallard, pied-billed grebe, pintail, ring-necked duck, whistling swan, common loon (ST), Canada goose
	• Common wading birds include black-crowned night heron, great blue heron, green heron
	
	Significant nesting sites
	• Critical habitat for piping plover (FE) exists along shorelines in the area of impact, including Thompson's Harbor State Park and Tawas Point
	• Scarecrow Island, Thunder Bay – there is a small colony of common terns and Caspian terns
	• Chantry Islands – significant numbers of great egret and black-crowned night heron (2-3% of the Canadian population) nest here; great blue heron also present
	• Other colonial nesting species include ring-billed gulls and double-crested cormorants
	
	Migratory sites
	• Lower peninsula's largest spring raptor migration (up to 18 species) can be found in coastal areas from Caseville to Huron City
	• Lower Au Sable River and Iosco County support high concentrations (50-160 individuals) of trumpeter swan (ST); use ice-free waterways in the winter
	• Tawas Point State Park is an important corridor for migratory passerines, waterbirds, and shorebirds
	  ○ Thousands of long-tailed ducks and red-breasted mergansers, hundreds of whimbrels, common terns, black terns and common loons have been recorded
	  ○ Sandspit is roosting habitat for terns, gulls and rare shorebirds (whimbrel, red knot, ruddy turnstone, piping plover)
	  ○ 297 species of birds have been observed in the park
		Waterfowl more common during spring/fall migration; some overwintering occurs in ice-free areas
		
		Shorebirds more common spring-fall; migration Apr-May and Jul-Sep
		
		Herons nesting Mar-Sep
		
		Double-crested cormorants nest Apr-Aug (peak Jun-Jul)
		
		Piping plover nesting Apr-Aug
		
		Herring gulls nest Apr-Jun
		
		Terns nest Apr-Oct
		
		Gulls nest Mar-Sep
		
		Shorebirds nest Mar-Aug
		
		Black-bellied plover present during spring and fall migrations
		
		Red-necked grebes molt in the fall

Species Group	Species Subgroup and Geography	Seasonal Presence
	• Tawas Bay supports a large concentration of diving ducks in the fall (mostly redheads), early winter and spring (long-tailed ducks) • Spring Bay is habitat for hundreds of migratory sandhill cranes in the fall; some breed in the area but most travel farther north • Owen Channel is molting location for red-necked grebes, grebes are flightless during the molt	
Mammals	Raccoons, muskrats, river otters and beavers can occur in nearshore regions and coastal streams in the area of impact	Year round
Fish & Invertebrates	*Common species* • Piscivores: steelhead/rainbow trout, white bass, smallmouth bass, lake trout, walleye, burbot, brown trout, chinook salmon • Forage fish: lake whitefish, lake herring (ST), white perch, yellow perch (school nearshore), emerald shiner, rainbow smelt, freshwater drum, alewife, gizzard shad, round goby, shorthead redhorse, pumpkinseed • Invertebrates: zebra and quagga mussels (both invasive), other snails and clams are an abundant food source for marine life • Threatened species include lake herring (or cisco; SE) and lake sturgeon (SE) *Distribution* • Lake sturgeon (SE) prefer shallow areas along the shoreline • Significant populations of lake herring occur in northern Lake Huron • Lake herring (SE) form large aggregations nearshore to spawn in early winter; eggs develop during the winter and hatch when the lake de-ices • Lake whitefish are abundant near shorelines in the fall and spawn in shallow bays or shoals less than 25 feet deep • Shorthead redhorse can be found in shallow lake waters with swift currents • Pumpkinseed, white bass, smallmouth bass, yellow perch and alewife all spawn in shallow (6" to 3 feet) of water • Smallmouth bass concentrate in shallow bays and on reefs in spring/summer • Brown trout aggregate at the mouths of spawning streams in late summer • Yellow perch spawning hotspot offshore of Port Austin	Spring spawning fish: lake sturgeon, walleye, rainbow trout, yellow perch, rainbow smelt, grass pickerel, alewife Fall spawning fish: Lake trout, brown trout Lake whitefish spawn early winter Burbot spawn mid-winter
Shoreline plants	Pitcher's thistle (FT) can be found on beaches and dunes north of Saginaw Bay	

The Environmental Sensitivity Index (ESI) atlases for the potentially impacted coastal areas from a leak from the *Monrovia* 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 both the Worst Case and the Most Probable Discharge oil release from the vessel. Risk factors for ecological resources at risk (EcoRAR) are divided into three categories:

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

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

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

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

As a reminder, the ecological impact thresholds are: 1 ppb aromatics for water column impacts; 10 g/m^2 for water surface impacts; and 100 g/m^2 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 *Monrovia* is provided, both as text and as shading of the applicable degree of risk bullet, for the WCD release of 2,000 bbl and a border around the Most Probable Discharge of 200 bbl.

Risk Factor 3A: Water Column Impacts to EcoRAR

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

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

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

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

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

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

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

The *Monrovia* is classified as Medium Risk for oiling probability for water column ecological resources for the WCD of 2,000 bbl because 22% of the model runs resulted in contamination of more than 0.2 mi^2 of the upper 33 feet of the water column above the threshold of 1 ppb aromatics. It is classified as Low Risk for degree of oiling because the mean volume of water contaminated was 0.17 mi^2 of the upper 33 feet of the water column. For the Most Probable Discharge of 200 bbl, the *Monrovia* is classified as Low Risk for oiling probability for water column ecological resources because 0% of the model runs resulted in contamination of more than 0.2 mi^2 of the upper 33 feet of the water column above the threshold of 1 ppb aromatics. It is classified as Low Risk for degree of oiling because the mean volume of water contaminated was 0 mi^2 of the upper 33 feet of the water column.

Risk Factor 3B: Water Surface Impacts to EcoRAR

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

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

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

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

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

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

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

The *Monrovia* is classified as High Risk for oiling probability for water surface ecological resources for the WCD because 84% of the model runs resulted in at least 1,000 mi^2 of the water surface affected above the threshold of 10 g/m^2. It is classified as Medium Risk for degree of oiling because the mean area of water contaminated was 1,800 mi^2. The *Monrovia* is classified as Low Risk for oiling probability for water surface ecological resources for the Most Probable Discharge because 0% of the model runs resulted in at least 1,000 mi^2 of the water surface affected above the threshold of 10 g/m^2. It is classified as Low Risk for degree of oiling because the mean area of water contaminated was 0 mi^2.

Risk Factor 3C: Shoreline Impacts to EcoRAR

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

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

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

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

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

The degree of oiling of the shoreline reflects the length of shorelines oiled by at least 100 g/m^2 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 *Monrovia* is classified as High Risk for oiling probability for shoreline ecological resources for the WCD because 89% of the model runs resulted in shorelines affected above the threshold of 100 g/m^2. It is classified as Medium Risk for degree of oiling because the mean weighted length of shoreline contaminated was 38 miles. The *Monrovia* is classified as High Risk for oiling probability to shoreline ecological resources for the Most Probable Discharge because 82% of the model runs resulted in

shorelines affected above the threshold of 100 g/m^2. It is classified as Medium Risk for degree of oiling because the mean weighted length of shoreline contaminated was 12 miles.

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

- Water column resources – Low, because of the limited area above thresholds
- Water surface resources – Medium, because of concentrations of nesting, migratory, and wintering waterfowl along the western half of Lake Huron that would be at risk. It should be noted that oil on the surface will not be continuous but rather be broken and patchy and in the form of tarballs and streamers
- Shoreline resources – Medium, because of the length of shoreline at risk, and the importance of these shorelines for migratory birds

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

Risk Factor	Risk Score			Explanation of Risk Score	Final Score
3A-1: Water Column Probability EcoRAR Oiling	Low	Medium	High	22% of the model runs resulted in at least 0.2 mi^2 of the upper 33 feet of the water column contaminated above 1 ppb aromatics	Low
3A-2: Water Column Degree EcoRAR Oiling	Low	Medium	High	The mean volume of water contaminated above 1 ppb was 0.17 mi^2 of the upper 33 feet of the water column	
3B-1: Water Surface Probability EcoRAR Oiling	Low	Medium	High	84% of the model runs resulted in at least 1,000 mi^2 of water surface covered by at least 10 g/m^2	Med
3B-2: Water Surface Degree EcoRAR Oiling	Low	Medium	High	The mean area of water contaminated above 10 g/m^2 was 1,800 mi^2	
3C-1: Shoreline Probability EcoRAR Oiling	Low	Medium	High	89% of the model runs resulted in shoreline oiling of 100 g/m^2	Med
3C-2: Shoreline Degree EcoRAR Oiling	Low	Medium	High	The length of shoreline contaminated by at least 100 g/m^2 was 38 mi	

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

- Water column resources – Low, because there are little-to-no impacts to the water column resources from such a small release
- Water surface resources – Low, because although concentrations of nesting, migratory, and wintering waterfowl along the western half of Lake Huron that would be at risk, the area of impact above ecological thresholds is small. It should be noted that oil on the surface will not be continuous but rather be broken and patchy and in the form of tarballs and streamers
- Shoreline resources – Medium, because of the moderate amount of potential shoreline oiling, mostly of gravel shorelines

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

Risk Factor	Risk Score			Explanation of Risk Score	Final Score
3A-1: Water Column Probability EcoRAR Oiling	**Low**	**Medium**	**High**	0% of the model runs resulted in at least 0.2 mi^2 of the upper 33 feet of the water column contaminated above 1 ppb aromatics	**Low**
3A-2: Water Column Degree EcoRAR Oiling	**Low**	**Medium**	**High**	The mean volume of water contaminated above 1 ppb was 0 mi^2 of the upper 33 feet of the water column	
3B-1: Water Surface Probability EcoRAR Oiling	**Low**	**Medium**	**High**	0% of the model runs resulted in at least 1,000 mi^2 of water surface covered by at least 10 g/m^2	**Low**
3B-2: Water Surface Degree EcoRAR Oiling	**Low**	**Medium**	**High**	The mean area of water contaminated above 10 g/m^2 was 560 mi^2	
3C-1: Shoreline Probability EcoRAR Oiling	**Low**	**Medium**	**High**	82% of the model runs resulted in shoreline oiling of 100 g/m^2	**Med**
3C-2: Shoreline Degree EcoRAR Oiling	**Low**	**Medium**	**High**	The length of shoreline contaminated by at least 100 g/m^2 was 12 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 *Monrovia* include numerous lakeside communities and state parks. There are also three national marine sanctuaries and a national wildlife refuge at risk.

Industry of the Great Lakes and Michigan, in particular, are at risk with one power plant that has water intakes on Lake Huron, and a $9M commercial fishing industry. While there are no ports that are in the area of impact, shipping traffic that goes in and out of ports in other parts of Lake Huron, Lake Michigan, and Lake Superior could potentially be affected by oiling and response activities.

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 important socio-economic resources at risk.

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

Resource Type	Resource Name	Economic Activities
Lakeside Communities	Alabaster Alcona Alpena Au Sable Bay Port Birch Beach Caseville East Tawas Forester Forestville Greenbush Grind Stone City Harbor Beach Harrisville Lexington Oscoda Point Aux Barques Port Hope Port Sanilac Presque Isle	Lakeside communities provide residents and visitors with recreational activities (e.g., swimming, boating, recreational fishing, wildlife viewing, nature study, sports, dining, camping, and amusement parks) with substantial income for local communities and state tax income. Numerous lakeside communities in Michigan are at risk.

Resource Type	Resource Name	Economic Activities
	Tawas City	
National Wildlife Refuge	Michigan Islands NWR	National wildlife refuges protect sensitive natural resources that are national treasures. The unique freshwater resources of the Michigan Islands NWR are at risk.
National Marine Sanctuaries	Sanilac Shores Underwater Preserve NMS Thumb Area Bottomland Preserve NMS Thunder Bay NMS	The National Marine Sanctuaries in Lake Huron are charged with protecting the Great Lakes and their rich maritime history through research, education, and resource protection. The sanctuary works to ensure that future generations can enjoy these underwater treasures.
Power Plant	Detroit Edison (Harbor Beach)	Power plants are at risk because they rely on relatively clean water for their water intakes. Contaminated water can disrupt the operations of affected power plants.
State Parks	Albert E. Sleeper State Park Harrisville State Park Lakeport State Park P.H. Hoeft State Park Port Crescent State Park Tawas Point State Park Thompson's Harbor State Park	Coastal state parks are significant recreational resources for the public (e.g., swimming, boating, recreational fishing, wildlife viewing, nature study, sports, dining, camping, and amusement parks). They provide income to the states. Many of these recreational activities are limited to or concentrated into the late spring into early fall months.

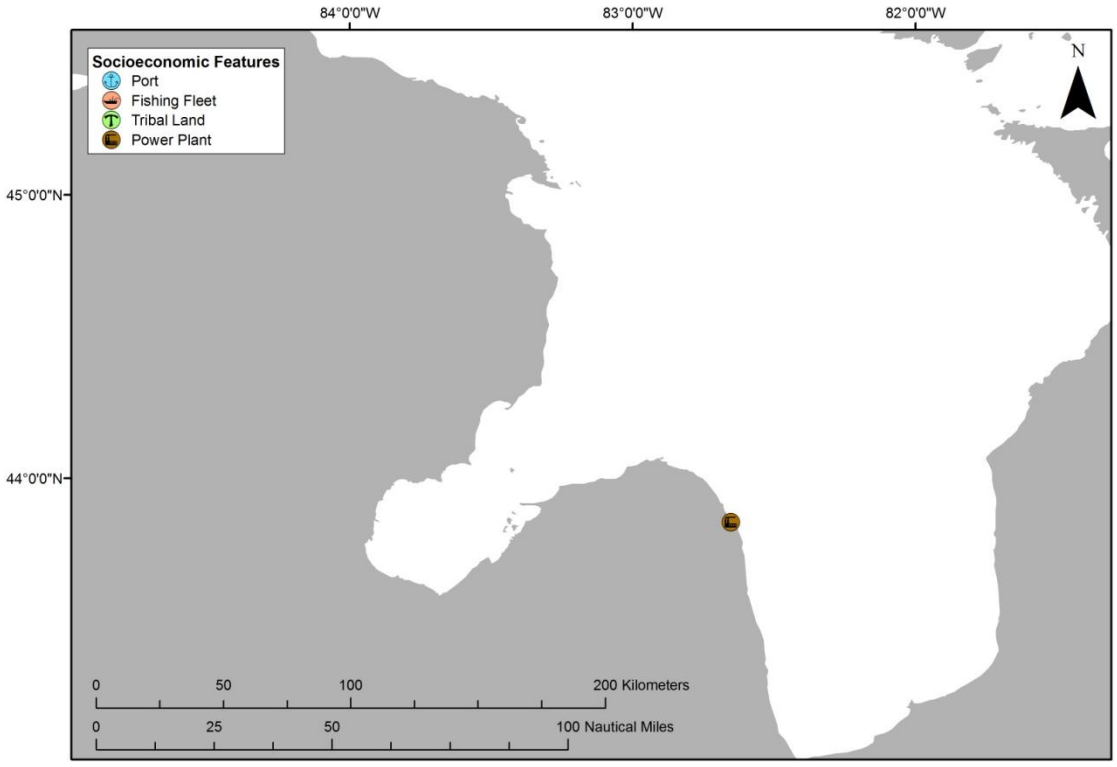


Figure 4-1: Tribal lands, ports, and commercial fishing fleets at risk from a release from the *Monrovia*. (Note that there are no tribal lands at risk. Commercial fishing fleet locations are not shown on this map.)

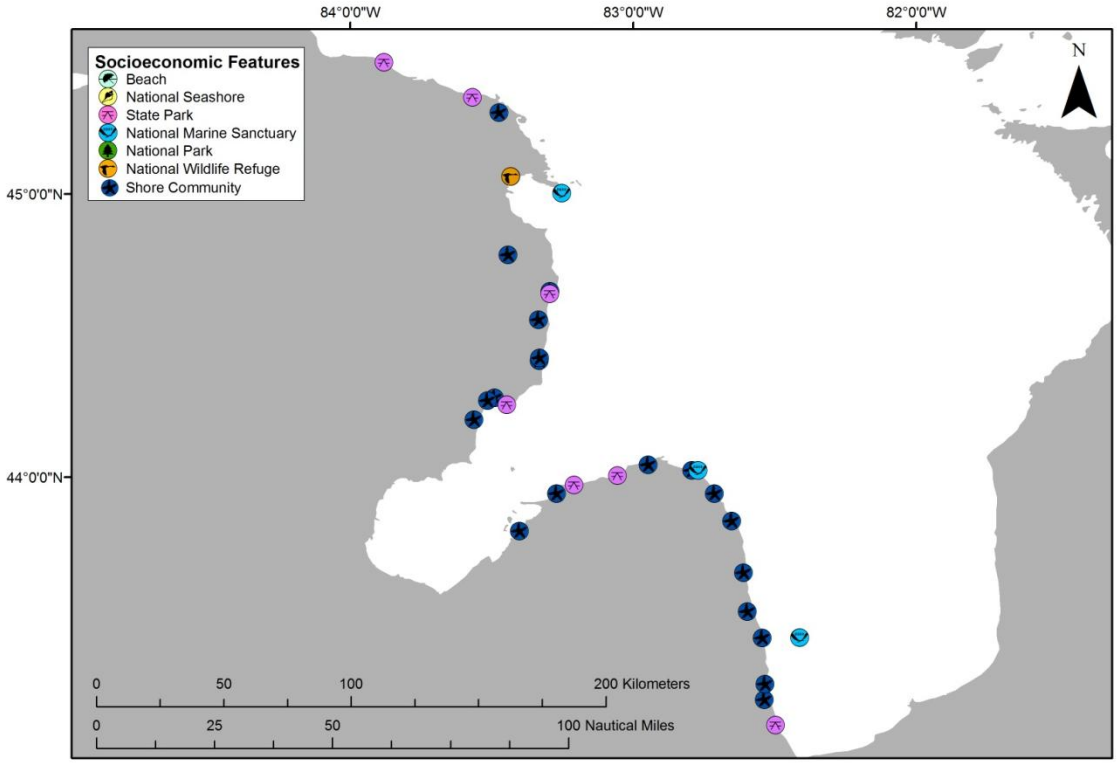


Figure 4-2: Beaches, coastal state parks, Federal protected areas, and shore communities at risk from a release from the *Monrovia*.

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 is to be any 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 for which there are significant impacts have less impact than this case, and half have more.

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

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

As a reminder, the socio-economic impact thresholds are: 1 ppb aromatics for water column impacts; 0.01 g/m^2 for water surface impacts; and 1 g/m^2 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 *Monrovia*, shading indicates the degree of risk for a WCD release of 2,000 bbl and a border indicates degree of risk for the Most Probable Discharge of 200 bbl.

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

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

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

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

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

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

The *Monrovia* is classified as Medium Risk for oiling probability and Low Risk for degree of oiling for water column socio-economic resources for the WCD of 2,000 bbl because 22% of the model runs resulted in contamination of more than 0.2 mi^2 of the upper 33 feet of the water column above the threshold of 1 ppb aromatics, and the mean volume of water contaminated was 0.17 mi^2 of the upper 33 feet of the water column. For the Most Probable Discharge of 200 bbl, the *Monrovia* is classified as Low Risk for oiling probability for water column socio-economic resources because 0% of the model runs resulted in contamination of more than 0.2 mi^2 of the upper 33 feet of the water column above the

threshold of 1 ppb aromatics. It was classified as Low Risk for degree of oiling because the mean volume of water contaminated was 0 mi^2 of the upper 33 feet of the water column.

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

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

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

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

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

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

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

The *Monrovia* is classified as High Risk for oiling probability and Medium Risk for degree of oiling for water surface socio-economic resources for the WCD because 84% of the model runs resulted in at least 1,000 mi^2 of the water surface affected above the threshold of 0.01 g/m^2, and the mean area of water contaminated was 1,800 mi^2. The *Monrovia* is classified as Low Risk for oiling probability for water surface socio-economic resources for the Most Probable Discharge because 0% of the model runs resulted in at least 1,000 mi^2 of the water surface affected above the threshold of 0.01 g/m^2. It is classified as Low Risk for degree of oiling because the mean area of water contaminated was 560 mi^2.

Risk Factor 4C: Shoreline Impacts to SRAR

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

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

This risk factor reflects the probability that the shoreline would be coated by enough oil to cause impacts to shoreline users. The threshold for impacts to shoreline SRAR is 1 g/m^2 (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 *Monrovia* is classified as High Risk for oiling probability for shoreline socio-economic resources for the WCD because 91% of the model runs resulted in shorelines affected above the threshold of 1 g/m^2. It is classified as Medium Risk for degree of oiling because the mean length of weighted shoreline contaminated was 66 miles. The *Monrovia* is classified as High Risk for oiling probability and Medium Risk for degree of oiling for shoreline socio-economic resources for the Most Probable Discharge as 91% of the model runs resulted in shorelines affected above the threshold of 1 g/m^2, and the mean length of weighted shoreline contaminated was 63 miles.

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

- Water column resources – Low, because a very small area would have water column impacts in an area with moderate fishing activities and national marine sanctuaries
- Water surface resources – Medium, because a moderate area of surface water impact included shipping lanes and national marine sanctuaries. 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 high-value lakeshore communities and the national marine sanctuaries

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

Risk Factor	Risk Score			Explanation of Risk Score	Final Score
4A-1: Water Column Probability SRAR Oiling	Low	**Medium**	High	22% of the model runs resulted in at least 0.2 mi^2 of the upper 33 feet of the water column contaminated above 1 ppb aromatics	**Low**
4A-2: Water Column Degree SRAR Oiling	**Low**	Medium	High	The mean volume of water contaminated above 1 ppb was 0.2 mi^2 of the upper 33 feet of the water column	
4B-1: Water Surface Probability SRAR Oiling	Low	Medium	**High**	84% of the model runs resulted in at least 1,000 mi^2 of water surface covered by at least 0.01 g/m^2	**Med**
4B-2: Water Surface Degree SRAR Oiling	Low	**Medium**	High	The mean area of water contaminated above 0.01 g/m^2 was 1,800 mi^2	
4C-1: Shoreline Probability SRAR Oiling	Low	Medium	**High**	91% of the model runs resulted in shoreline oiling of 1 g/m^2	**Med**
4C-2: Shoreline Degree SRAR Oiling	Low	**Medium**	High	The length of shoreline contaminated by at least 1 g/m^2 was 66 mi	

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

- Water column resources – Low, because a very small area would have water column impacts in an area with moderate fishing activities and national marine sanctuaries
- Water surface resources – Low, because a relatively small area of surface water would be impacted in shipping lanes and national marine sanctuaries. 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 high-value and sensitive areas, including lakeshore communities and national marine sanctuaries

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

Risk Factor	Risk Score			Explanation of Risk Score	Final Score
4A-1: Water Column Probability SRAR Oiling	**Low**	**Medium**	**High**	0% of the model runs resulted in at least 0.2 mi^2 of the upper 33 feet of the water column contaminated above 1 ppb aromatics	**Low**
4A-2: Water Column Degree SRAR Oiling	**Low**	**Medium**	**High**	The mean volume of water contaminated above 1 ppb was 0 mi^2 of the upper 33 feet of the water column	
4B-1: Water Surface Probability SRAR Oiling	**Low**	**Medium**	**High**	0% of the model runs resulted in at least 1,000 mi^2 of water surface covered by at least 0.01 g/m^2	**Low**
4B-2: Water Surface Degree SRAR Oiling	**Low**	**Medium**	**High**	The mean area of water contaminated above 0.01 g/m^2 was 560 mi^2	
4C-1: Shoreline Probability SRAR Oiling	**Low**	**Medium**	**High**	91% of the model runs resulted in shoreline oiling of 1 g/m^2	**Med**
4C-2: Shoreline Degree SRAR Oiling	**Low**	**Medium**	**High**	The length of shoreline contaminated by at least 1 g/m^2 was 63 mi	

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

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

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

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

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

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

For the Worst Case Discharge, *Monrovia* scores Medium with 12 points; for the Most Probable Discharge, *Monrovia* 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 *Monrovia*. The final determination of what type of action, if any, rests with the U.S. Coast Guard.

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

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

Vessel Risk Factors		Data Quality Score	Comments		Risk Score
Pollution Potential Factors	A1: Oil Volume (total bbl)	Medium	Maximum of 1,191 bbl, not reported to be leaking		**Med**
	A2: Oil Type	High	Bunker oil is heavy fuel oil, a Group IV oil type		
	B: Wreck Clearance	High	Vessel partially dynamited		
	C1: Burning of the Ship	High	No fire was reported		
	C2: Oil on Water	Low	No oil was reported on the water		
	D1: Nature of Casualty	High	Collision		
	D2: Structural Breakup	High	Vessel remains as one contiguous piece		
Archaeological Assessment	Archaeological Assessment	High	Partial sinking records were located and detailed site reports exist, so the assessment is believed to be very accurate		**Not Scored**
Operational Factors	Wreck Orientation	High	Upright		**Not Scored**
	Depth	High	140 ft		
	Visual or Remote Sensing Confirmation of Site Condition	High	Location is a popular dive site		
	Other Hazardous Materials Onboard	High	No		
	Munitions Onboard	High	No		
	Gravesite (Civilian/Military)	High	No		
	Historical Protection Eligibility (NHPA/SMCA)	High	NHPA		
				WCD	**Most Probable**
Ecological Resources	3A: Water Column Resources	High	Little to no volume of the water column was predicted to be above thresholds for ecological resources	**Low**	**Low**
	3B: Water Surface Resources	High	Persistent tarballs pose risks to areas of concentrations of nesting, migratory, and wintering waterfowl	**Med**	**Low**
	3C: Shore Resources	High	High probability of shoreline impact	**Med**	**Med**
Socio-Economic Resources	4A: Water Column Resources	High	Very small area could have water column impacts in an area with moderate fishing activities and the national marine sanctuaries	**Low**	**Low**
	4B: Water Surface Resources	High	Moderate area of surface water could be impacted in shipping lanes and the national marine sanctuaries	**Med**	**Low**
	4C: Shore Resources	High	Moderate length of shoreline could be impacted in high-value and sensitive areas, including lakeshore communities and the national marine sanctuaries	**Med**	**Med**
Summary Risk Scores				**12**	**10**