

U.S. Department of
Homeland Security

United States
Coast Guard



Commandant
United States Coast Guard

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Mr. Wally Landry
General Manager
Crucial, Inc.
142 Enterprise Drive
Gretna, LA 70056

MAR 28 2013

Dear Mr. Landry:

Thank you for sending us the OHMSETT test results for your coated disc and coated drum skimming systems that you recently evaluated using the ASTM F2709 standard. We wholeheartedly applaud Crucial Inc.'s efforts and investments to develop your patented skimmer technologies and validate their nameplate recovery rates at OHMSETT. Your willingness to submit to testing provides valuable data to plan holders, oil spill removal organizations (OSROs), and regulators in comparing and analyzing skimmer capabilities. As such, the Coast Guard is pleased to officially recognize the following nameplate recovery rates:

Skimmer Model	Skimmer Type	Nameplate Recovery Rate (NRR)	Test Standard
C-DISC 88/30	Coated Disc Skimmer	860 GPM	ASTM F2709-08
C-DISC 56/30	Coated Disc Skimmer	402 GPM	ASTM F2709-08
C-DISC 13/30	Coated Disc Skimmer	138 GPM	ASTM F2709-08
C-DISC 13/24	Coated Disc Skimmer	85 GPM	ASTM F2709-08
1CD18H-36	Coated Drum Skimmer	54 GPM	ASTM F2709-08

As you are likely aware, the Coast Guard and the Bureau of Safety and Environmental Enforcement (BSEE) are currently sponsoring a joint research project on evaluating Effective Daily Recovery Capacity (EDRC), and in particular, looking for ways to improve both the nameplate rating of skimming systems based on performance and the means to apply the nameplate data to a set of planning requirements that better approximates recovery potential in anticipated operating environments. As we are in the final stages of this study, we anticipate that the recommendations may suggest incorporating a standard test, such as ASTM F2709-08, into a new methodology that more fully evaluates skimmer system potential. Our hope and intent is that technologies and skimmer system designs like your coated disc and coated drum skimmers will inform future improvements/changes to the existing EDRC regulations, with the ultimate goal of better aligning planning standards with expected actual performance. Furthermore, we are looking at ways to provide regulatory incentives for plan holders and OSROs to invest in the best skimmer system technology available, including systems that demonstrate, through recognized testing standards, the highest recovery potential in both ideal and realistic spill conditions.

We sincerely appreciate the extra efforts you have undertaken to gather actual performance data on your skimmers in advance of any future regulatory requirements. They also speak very highly to your commitment to develop quality oil spill response products, your drive to push response technologies forward, and to your desire to be fully transparent regarding their actual capability with both government regulators and industry partners. I look forward to reviewing future test results as Crucial Inc. continues to pioneer new and exciting skimmer technologies as an industry leader in spill response equipment.

Sincerely,



J. R. Caplis
Captain, U.S. Coast Guard
Chief, Office of Marine Environmental Response
Policy (CG-MER)