Oil Pollution Act Liability Limits in 2025

Report to Congress

May 26, 2026

U.S. Coast Guard

Foreword

May 26, 2026

I am pleased to present the following report, "Oil Pollution Act Liability Limits in 2025," prepared by the U.S. Coast Guard.

The Coast Guard and Maritime Transportation Act of 2006 directs the submission of an analysis of the extent to which oil discharges from vessels and non-vessel sources have, or are likely to result in, removal costs and damages for which no defense to liability exists and that exceed the established liability limits.

Pursuant to congressional requirements, this report is provided to the following Members of Congress:

Senator Ted Cruz
Chairman, Senate Committee on Commerce, Science, and Transportation

Senator Maria Cantwell
Ranking Member, Senate Committee on Commerce, Science, and Transportation

Representative Sam Graves
Chairman, House Committee on Transportation and Infrastructure

Representative Rick Larsen
Ranking Member, House Committee on Transportation and Infrastructure

Please direct report inquiries to my Senate Liaison Office at (202) 224-2913 or House Liaison Office at (202) 225-4775.

Sincerely,

Kevin E. Lunday
Admiral, U.S. Coast Guard
Commandant

Oil Pollution Act Liability Limits in 2025

Table of Contents

I. Legislative Language

This report responds to the language set forth in section 603(c) of the Coast Guard and Maritime Transportation Act of 2006 (Pub. L. 109-241), as amended by section 601(b) of the Coast Guard Authorization Act of 2016 (Pub. L. 114-120), which states:

SEC. 603. LIMITS ON LIABILITY.

(c) REPORT.—

(1) Initial Report. – Not later than 45 days after the date of enactment of this Act, the Secretary of the department in which the Coast Guard is operating shall submit a report on liability limits described in paragraph (2) to the Committee on Commerce, Science, and Transportation of the Senate and the Committee on Transportation and Infrastructure of the House of Representatives.

(2) Contents. – The report shall include, at a minimum, the following:

(A) An analysis of the extent to which oil discharges from vessels and nonvessel sources have or are likely to result in removal costs and damages (as defined in section 1001 of the Oil Pollution Act of 1990 (33 U.S.C. § 2701)) for which no defense to liability exists under section 1003 of such Act and that exceed the liability limits established in section 1004 of such Act, as amended by this section.

(B) An analysis of the impacts that claims against the Oil Spill Liability Trust Fund for amounts exceeding such liability limits will have on the Fund.

(C) Based on analyses under this paragraph and taking into account other factors impacting the Fund, recommendations on whether the liability limits need to be adjusted in order to prevent the principal of the Fund from declining to levels that are likely to be insufficient to cover expected claims.

(3) Annual Updates. – The Secretary shall provide an update of the report to the Committees referred to in paragraph (1) not later than January 30 of the year following each year in which occurs an oil discharge from a vessel or nonvessel source that results or is likely to result in removal costs and damages (as those terms are defined in section 1001 of the Oil Pollution Act of 1990 (33 U.S.C. § 2701)) that exceed liability limits established under section 1004 of the Oil Pollution Act of 1990 (33 U.S.C. § 2704).

II. Background

The *Oil Pollution Act of 1990* was enacted in the wake of the *Exxon Valdez* oil spill to promote measures for prevention of oil spills on navigable waters, adjoining shorelines, and the exclusive economic zone. It provides a robust federal response to spills, increases polluter (Responsible Party) liability for such spills, and provides for compensation to third parties who incurred removal costs and damages because of these spills.

The Oil Pollution Act of 1990 provides that Responsible Parties are strictly liable for removal costs and damages resulting from a discharge up to statutory liability limits. In general, Responsible Parties are liable without limit for discharge resulting from gross negligence, willful misconduct, or a violation of operation, safety, or construction regulations (Oil Pollution Act of 1990 § 1004 (33 U.S.C. § 2704)).

In 1986, Congress established within the Treasury of the United States, the Oil Spill Liability Trust Fund (the Fund);[1] however, it was not until after the 1989 *Exxon Valdez* oil spill that, under the Oil Pollution Act of 1990, Congress transferred monies into the Fund and authorized its use. The National Pollution Funds Center was created and delegated authority by the Commandant, via re-delegations of authority vested in the Secretary of the department in which the Coast Guard was operating at the time, to manage the Fund. The Fund plays a critical role in the Oil Pollution Act of 1990 regime. It pays federal costs for oil removal when a discharge occurs and reimburses third-party claims for uncompensated removal costs and damages when a Responsible Party does not pay or is not identified.

The types of damages compensable under the Oil Pollution Act of 1990 include damages to natural resources, loss of subsistence use of natural resources, damages to real or personal property, loss of profits or earning capacity, loss of government revenues, and increased cost of public services. In addition, the Fund is an important source of annual appropriations to various federal agencies responsible for administering and enforcing a wide range of oil pollution prevention and response programs addressed in the Oil Pollution Act of 1990 (Oil Pollution Act of 1990 § 1012 (33 U.S.C. § 2712)).

Specific to this report, the Fund is available, as provided by the Oil Pollution Act of 1990, to pay claims for removal costs and damages resulting from an oil discharge that exceeds a Responsible Party's liability limits. This includes payment of claims from Responsible Parties who pay or incur removal costs or damages more than their liability limits and can establish their entitlement to the limits under the circumstances of the discharge (Oil Pollution Act of 1990 § 1008 (33 U.S.C. § 2708)).

Claims to the Fund are payable only from the Fund, and payments are limited by the available balance. For any single discharge incident, the Fund is authorized to pay no more than $1.5 billion, of which no more than $750 million may be paid for natural resource damages (Oil Pollution Act of 1990 § 9001(c) (26 U.S.C. § 9509)).

Pursuant to section 603 of the *Coast Guard and Maritime Transportation Act of 2006*, liability limits for vessel discharges were substantially increased. In that same section, Congress requested this analysis and report.

---

[1] Omnibus Budget Reconciliation Act of 1986 (Pub. L. 99-509)

III. Analysis of Discharges

This section provides an analysis of the extent to which oil discharges from non-vessel and vessel sources have resulted, or are likely to result, in removal costs and damages, as defined in the Oil Pollution Act of 1990, that exceed liability limits established in the Oil Pollution Act of 1990, as amended by the *Coast Guard and Maritime Transportation Act of 2006*.

A. Non-vessel Sources

Offshore Facilities

When the liability limits under the Oil Pollution Act of 1990 apply, Responsible Parties for an offshore facility will be liable for all removal costs plus up to $167.8 million for damages[2] with respect to each incident. [3]

The incident involving the DEEPWATER HORIZON drilling rig and its Macondo Prospect well (DEEPWATER HORIZON incident) in the Gulf of America, which began in April 2010, was an unprecedented environmental disaster that resulted in billions of dollars in damages, far exceeding the statutory liability limit for an offshore facility. In response to this incident, on May 12, 2010, the Obama Administration proposed raising the limitation of liability for all Responsible Parties, including those responsible for offshore facilities.[4] BP, one of DEEPWATER HORIZON's Responsible Parties, estimated that the cost of the incident totaled $65 billion.[5] Incident data for offshore facilities are presented in Appendix A.

In 2004, an uncontrolled oil discharge from production wells associated with a TAYLOR ENERGY oil platform began and oil spill response collection efforts are still ongoing. On March 17, 2022, the U.S. Department of Justice announced completion of a settlement agreement with TAYLOR ENERGY. TAYLOR ENERGY transferred $432 million to the Department of the Interior for a trust fund dedicated to plugging the subsea oil wells. TAYLOR ENERGY also paid $12.8 million to the Coast Guard to reimburse past costs paid for by the Fund, $15 million for a Clean Water Act civil penalty, and $16.5 million for natural resource damages to help compensate the public for losses to natural resources caused by the spill. TAYLOR ENERGY is an ongoing incident, and the full extent of removal costs and damages are currently unknown.

With respect to offshore facility incidents (other than the incidents involving the DEEPWATER HORIZON incident and the TAYLOR ENERGY incident), the best available data indicates that there have been 63 incidents since enactment of the Oil Pollution Act of 1990 resulting in removal costs and damages (seven Drilling Rigs and 56 Offshore Platforms).

[2] Damages are defined at 33 U.S.C. § 2701(5).
[3] See 88 Fed. Reg. 22910 (April 14, 2023).
[4] The Responsible Party for an offshore facility is defined at 33 U.S.C. § 2701(32)(C).
[5] See BP Deepwater Horizon costs balloon to $65 billion | Reuters

Figure 1 shows the frequency of these incidents by year and facility type.

Figure 1: Number of Offshore Facility Incidents by Year and Facility Type
(Excludes 2010 DEEPWATER HORIZON and TAYLOR ENERGY Oil Spills)

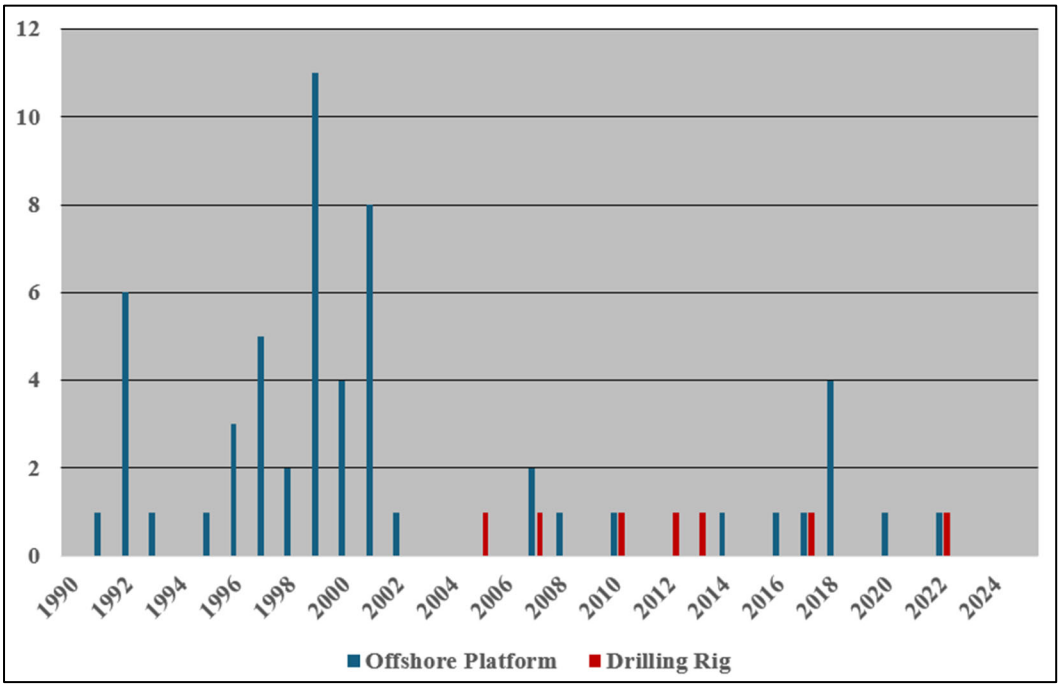
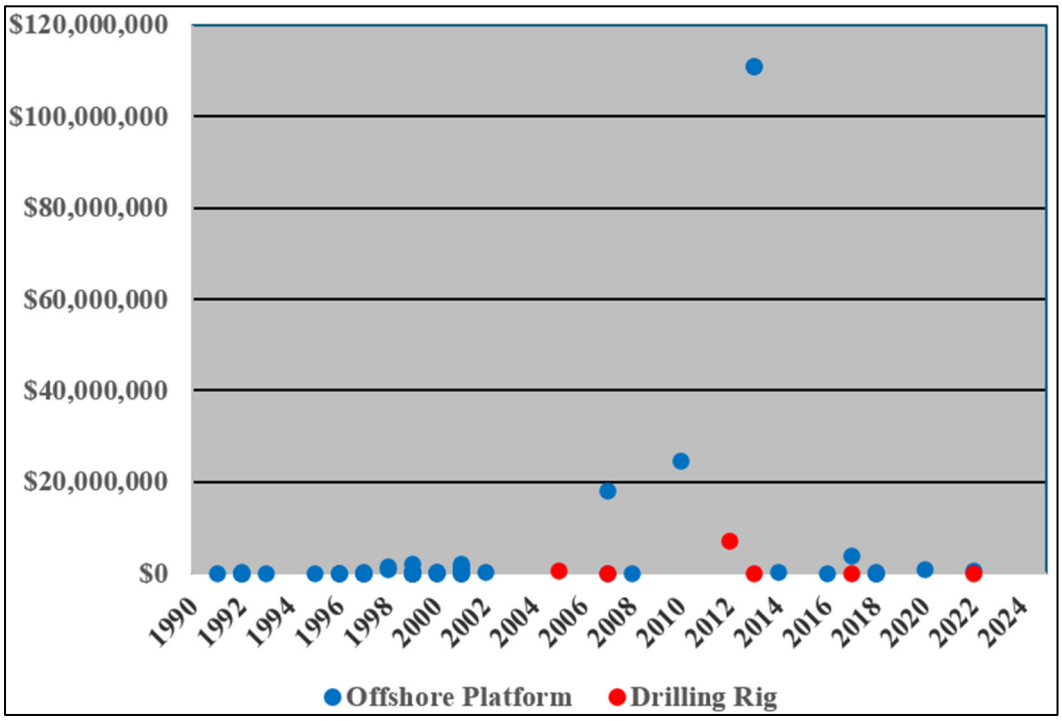


Figure 2 shows total incident costs for each incident.

Figure 2: Total Incident Cost of Offshore Facility Incidents by Facility Type
(2025 Dollars / Excludes DEEPWATER HORIZON and TAYLOR ENERGY Oil Spills)

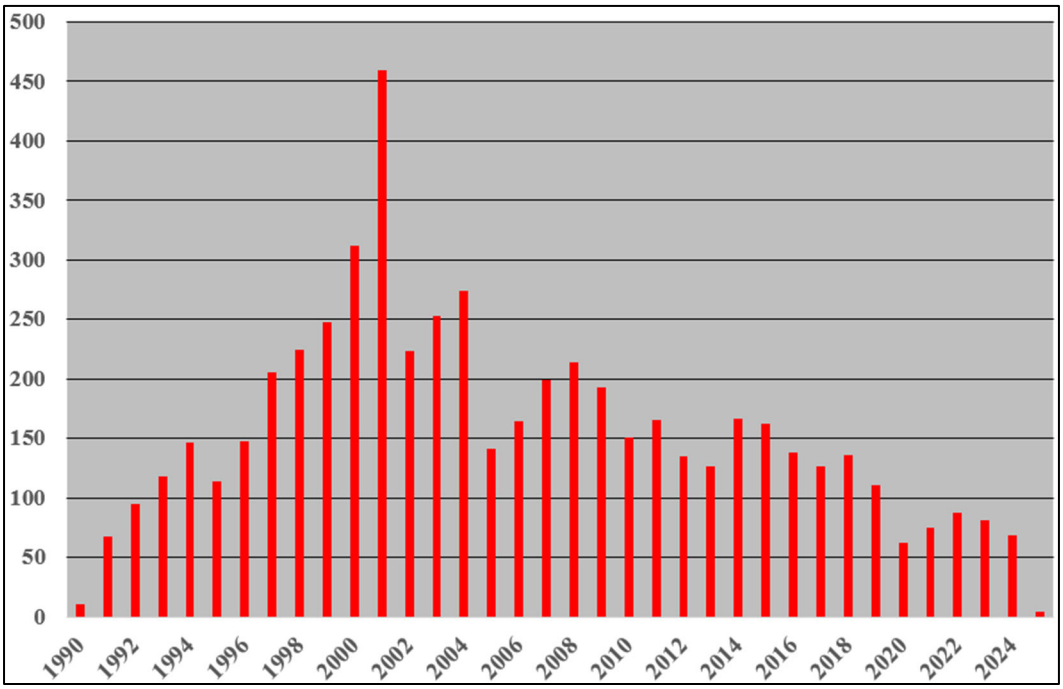


Onshore Facilities

For incidents involving discharges from onshore facilities, the Oil Pollution Act of 1990 limit of liability is $725,710,800 per incident, inclusive of both removal costs and damages.[6] The 2010 ENBRIDGE ENERGY PARTNERS LAKEHEAD LINE 6B pipeline oil spill in Michigan and the 2022 TC ENERGY MILEPOST 14 pipeline spill in Kansas, on the Keystone Pipeline System, are the two onshore facility incidents that reportedly resulted in removal costs and damages that exceed the onshore facility liability limit. ENBRIDGE ENERGY PARTNERS reported costs of $1.2 billion resulting from its LAKEHEAD LINE 6B pipeline spill. TC ENERGY reported costs of $794 million resulting from the MILEPOST 14 pipeline spill. Adjusting for inflation from the years of the incidents to the current year (2025 dollars) increases the total incident costs to $1.8 billion and $873.4 million respectively. When comparing the inflation-adjusted cost of damages to the current limit of liability, the data show that both incidents exceed the current limit of liability. Incident data for onshore facilities are presented in Appendix A. There are no other onshore facility incidents that approach the $725,710,800 limit under existing law.

With respect to onshore facility incidents (other than the incidents involving the ENBRIDGE pipeline and TC ENERGY MILEPOST 14 on the Keystone Pipeline System), best available data indicates there were 5,606 incidents since the enactment of the Oil Pollution Act of 1990. Figure 3 shows the frequency of these incidents by year.

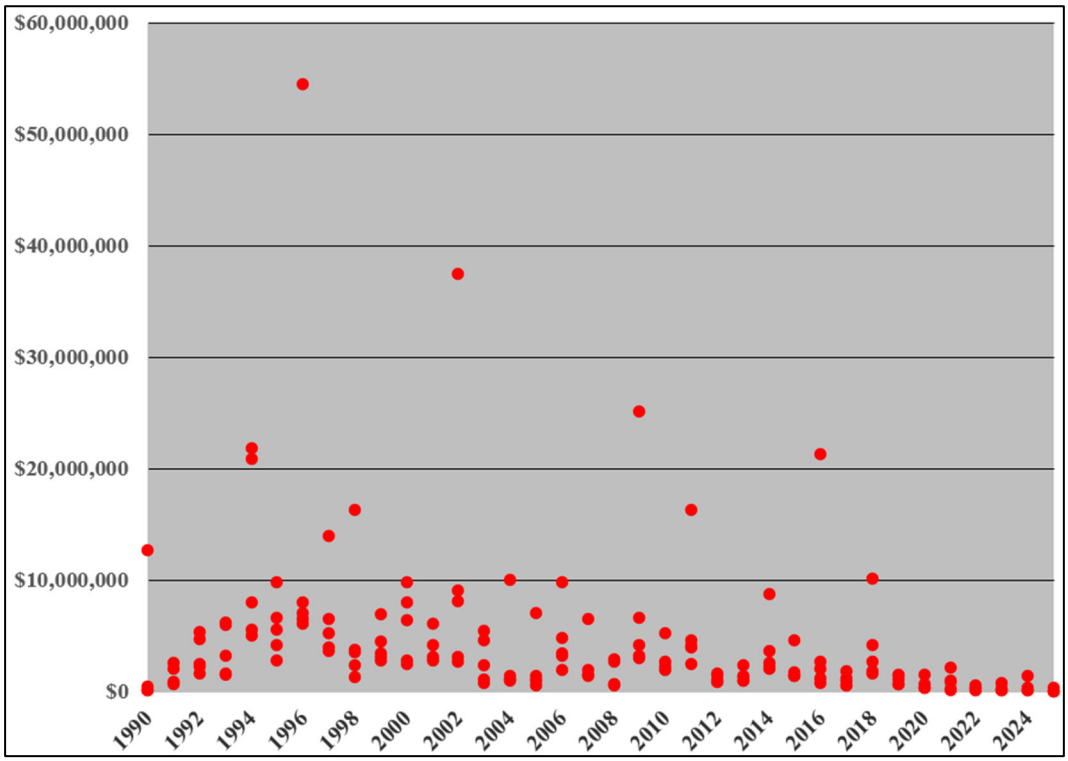
Figure 3: Number of Onshore Facility Incidents by Year
(Excludes 2010 ENBRIDGE LAKEHEAD LINE 6B and 2022 TC ENERGY MILEPOST 14 Pipeline Oil Spills)



[6] 33 U.S.C. § 2704 (a)(4) and 33 C.F.R. § 138.230. The onshore facility limit of liability is subject to adjustment by regulatory action to reflect significant increases in the Consumer Price Index under 33 U.S.C. § 2704(d)(4) and may also be adjusted for risk under 33 U.S.C. § 2704(d)(1).

Figure 4 shows total incident costs of the five most expensive onshore facility incidents that occurred each year. As depicted, the highest cost incident, at approximately $54.5 million (in 2025 dollars), is well below the statutory $725,710,800 limit of liability.

Figure 4: Total Incident Cost of the Five Most Expensive Onshore Facility Incidents per Year (2025 Dollars / Excludes 2010 ENBRIDGE LAKEHEAD LINE 6B and 2022 TC ENERGY MILEPOST 14 Pipeline Oil Spills)



B. Vessel Sources

After adjusting for inflation, the Oil Pollution Act of 1990 provides the following liability limits for vessels, inclusive of both removal costs and damages:[7]

(1) For a single-hull tank vessel greater than 3,000 gross tons, the greater of $4,000 per gross ton or $29,591,300.

(2) For a tank vessel greater than 3,000 gross tons, other than a single-hull tank vessel, the greater of $2,500 per gross ton or $21,521,000.

(3) For a single-hull tank vessel less than or equal to 3,000 gross tons, the greater of $4,000 per gross ton or $8,070,400.

(4) For a tank vessel less than or equal to 3,000 gross tons, other than a single-hull tank vessel, the greater of $2,500 per gross ton or $5,380,300.

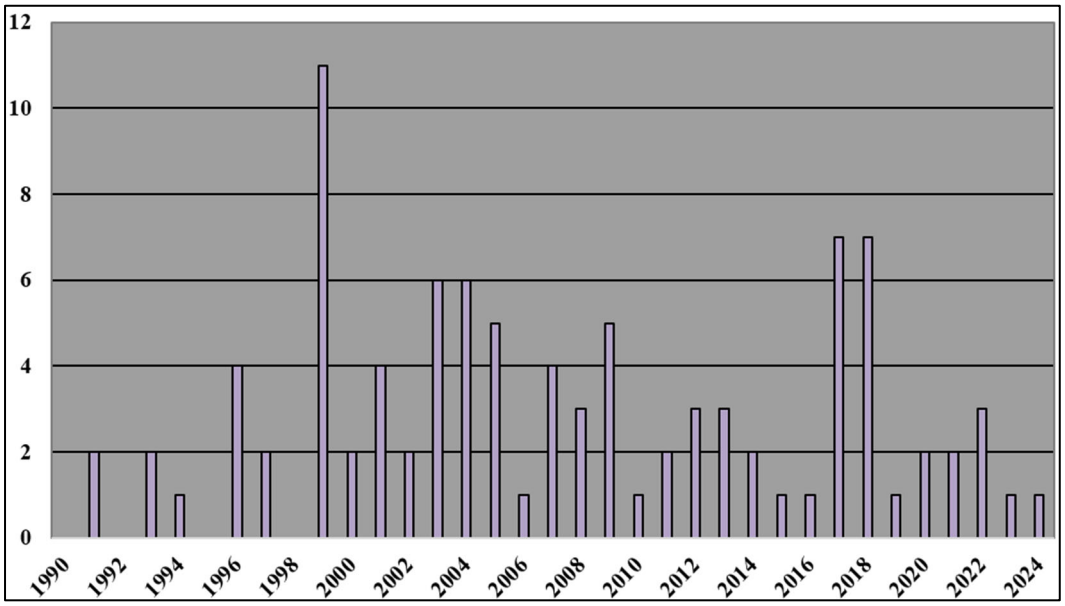
(5) For any other vessel, the greater of $1,300 per gross ton or $1,076,000.

[7] 33 C.F.R. § 138.230.

The best available data indicates 97 oil discharges from vessels resulted in removal costs and damages exceeding the amended vessel liability limits. The data was updated to incorporate new incidents and reflect revised estimates of costs and damages associated with previously reported incidents.[8,9] Discharge incidents are listed by vessel type in Appendix B and by incident date in Appendix C.

Figure 5 depicts the number of such discharges per year. The elevated total for 1999 is the result of a hurricane in American Samoa, resulting in oil discharges from eight damaged fishing vessels. The figure illustrates the variance in numbers of incidents from year to year.

Figure 5: Number of Vessel Incidents Exceeding Limits of Liability



[8] References throughout this report to data for the year 2025 are partial year data ending on May 1, 2025.
[9] We note that, under 46 U.S.C. § 3703a, it is illegal to operate "single hull" tank vessels in U.S. waters, with the exception of those vessels described under 46 U.S.C. § 3703a(b)(4), as of January 1, 2015. The Oil Pollution Act of 1990, however, still specifies limits of liability for these vessels. Therefore, we continue to discuss the single hull tank vessel limits of liability in this report.

Figure 6 shows a breakdown of these 97 incidents by vessel type. Fishing vessels account for 32 percent of historic incidents resulting in removal costs and damages in excess of the liability limits, while cargo and other self-propelled non-tank vessels represent 55 percent of incidents. Single hull and double hull tank barges represent 8 percent and 3 percent, respectively. Single hull tank ships account for only 2 percent of such discharges. There are no double hull tank ship incidents among the 97 incidents.

Figure 6: Number of Incidents Exceeding Limits of Liability by Vessel Type

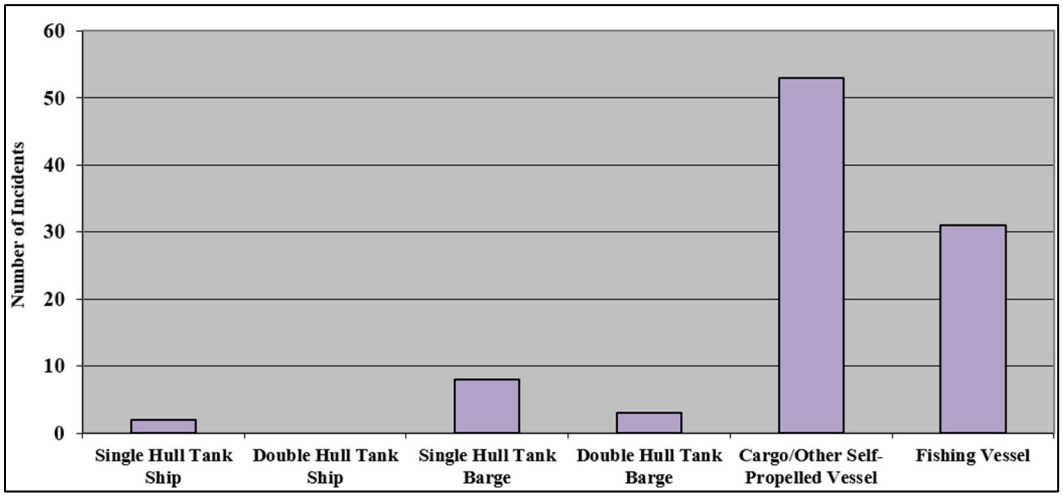
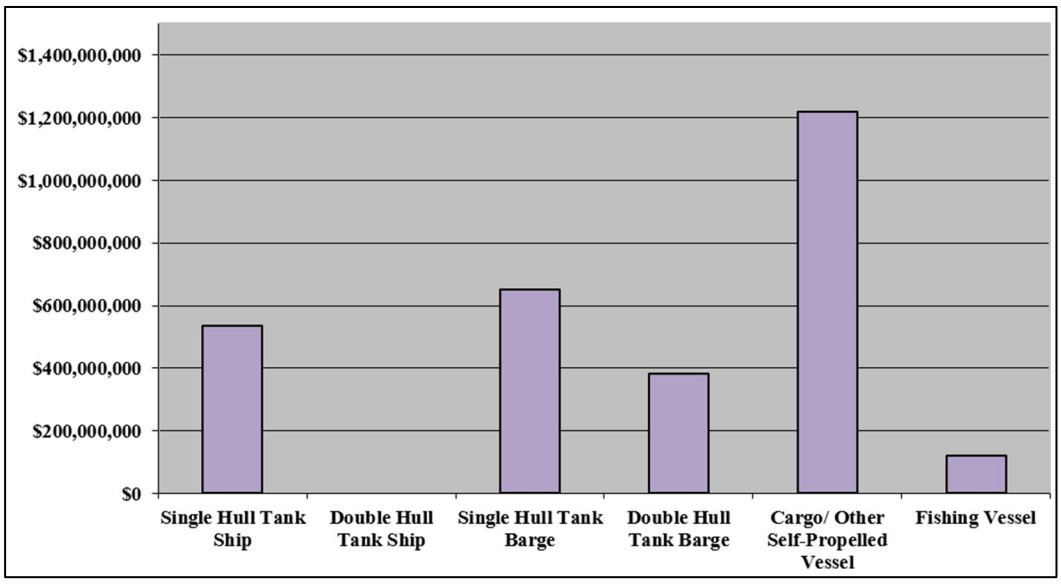


Figure 7 shows total removal costs and damages from these incidents by vessel type. Total costs in excess of liability limits for cargo/other self-propelled vessel discharges were the highest. Total costs for single hull tank ship and tank barge discharges that exceed liability limits were also significant. Per discharge costs from single hull tank ship incidents are the highest (approximately $268.5 million) considering the quantities of oil these vessels carry. Per discharge costs for all tank barges are also substantial (approximately $93.8 million). Larger cargo vessels also carry enough fuel to result in costly discharges (approximately $23.0 million per incident). The small size and limited quantities of oil characteristic of most fishing vessel incidents generally account for lower total costs of such discharges (approximately $3.9 million), shown here and in more detail in Appendix B.

Total removal costs and damages for these discharges since enactment of the Oil Pollution Act of 1990 is approximately $2.9 billion.

Figure 7: Total Incident Costs by Vessel Type



IV. Impacts on the Fund

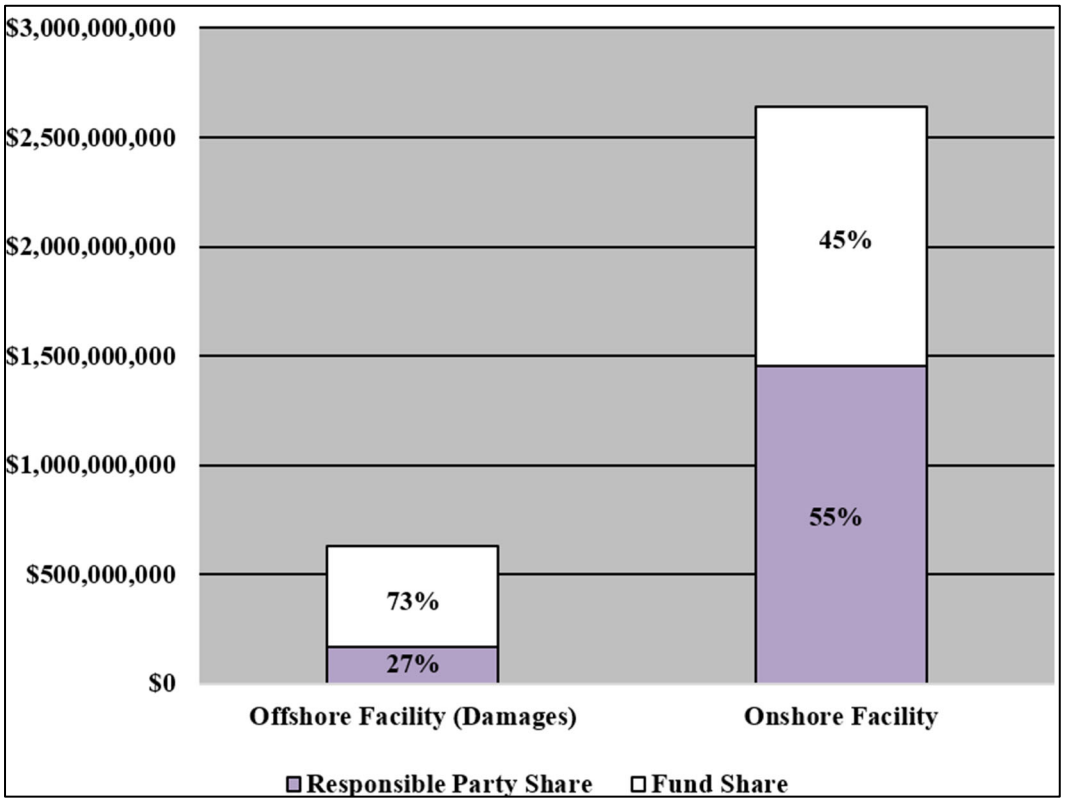
This section provides an analysis of the impacts on the Fund resulting from claims against the Fund for incidents in which costs and damages exceed liability limits.

A. Historical Impact

Non-vessel Sources

As indicated in Figure 8, the Fund's financial obligation in cases where damages for offshore facilities and removal costs and damages for onshore facilities exceed liability limits is substantial despite liability limit amendments. The top portion of the bar for each facility type represents the Fund's share of the risk (exceeding applicable liability limit). The bottom portion of the bar for each facility type represents Responsible Party risk (Responsible Party liability limit as applicable for each discharge).

Figure 8: Responsible Party vs. Fund Share of Damages for Offshore Facilities and Total Incident Costs for Onshore Facilities



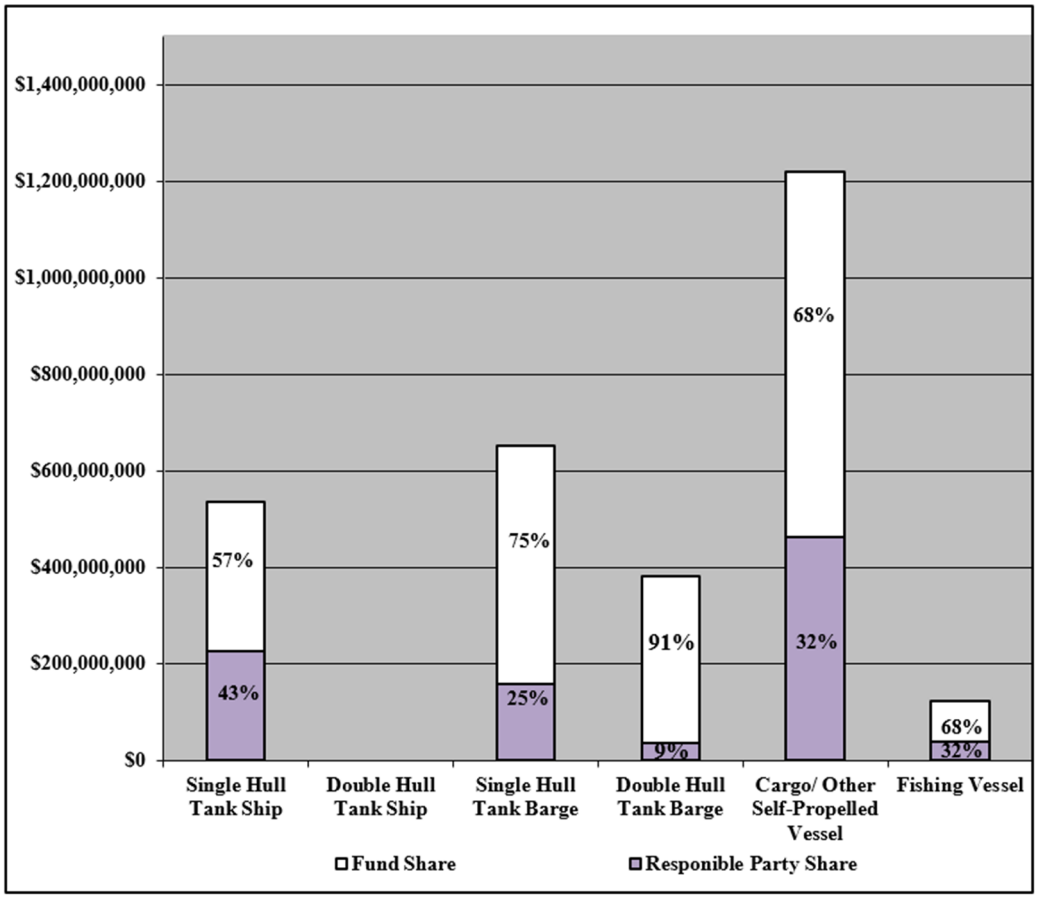
Based on data from the one offshore facility and two onshore facilities that have exceeded their respective limits of liability, the Fund paid considerably more of the damages resulting from the offshore facility incident. The two onshore facility incidents, however, have a more equitable cost share between the Responsible Party and the Fund.[10]

[10] It is important to note that the number of offshore facilities (one) and onshore facilities (two) that have exceeded the limit of liability are of such small sample sizes compared to the total number of incidents in their respective categories that any conclusions made in this report on the adequacy of their limits of liability do not have a high level of fidelity.

Vessel Sources

As indicated in Figure 9, the Fund's financial obligation in cases where removal costs and damages exceed liability limits (listed in Appendix B) is substantial despite liability limit amendments. The top portion of the bar for each vessel type represents the Fund's share of the risk (exceeding applicable liability limit). The bottom portion of the bar for each vessel type represents Responsible Party risk (Responsible Party liability limit based on gross tonnage or minimum limit as applicable for each discharge).

Figure 9: Responsible Party vs. Fund Share of Total Incident Costs under Current Limits by Vessel Type



Of the approximately $2.9 billion in estimated removal costs and damages from these incidents over the last 34 years, the Fund's share of costs totals approximately $2.0 billion (68.3 percent). This amount represents a maximum potential impact on Fund risk resulting solely from application of liability limit levels. While the rate of such incidents is difficult to predict and may vary widely from year-to-year (as indicated by Figure 5), risk to the Fund is expressed broadly as an annual cost of approximately $58.6 million (total costs of $2.0 billion over 34 years) in excess of amended limits in 2025 dollars.

B. Impact from Claims

Over the past 34 years, the National Pollution Funds Center paid over $1 billion to claimants in connection with Oil Pollution Act of 1990 incidents. Of this total, $462.5 million (or 45 percent) was paid in respect to circumstances where removal costs and damages exceeded applicable liability limit amounts (Figure 10). These "limit of liability" payments include those made directly to Responsible Parties for removal costs and damages they paid or incurred in excess of liability limits, as well as third-party claims paid by the Fund because the Responsible Party spent up to its limit of liability.

Figure 11 shows that of the $6 million in claims under adjudication as of May 1, 2025, $4.8 million (or 80 percent of the total dollars) are pending claims by Responsible Parties who incurred incident costs exceeding their liability limits or claims by third parties where incident costs exceeded the liability limits.

Figure 10: Total Claims Paid

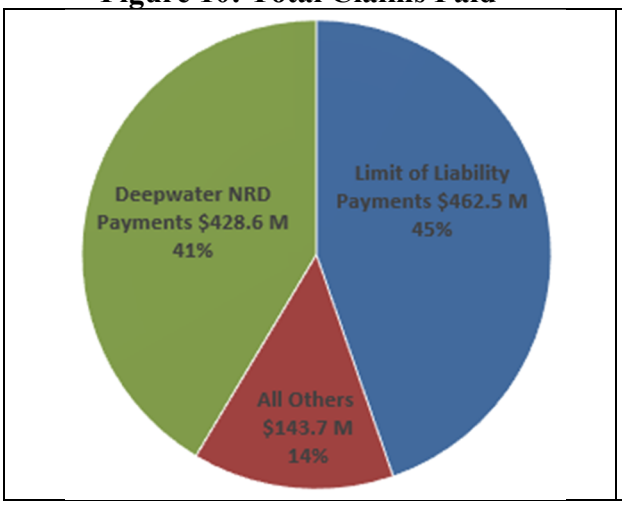
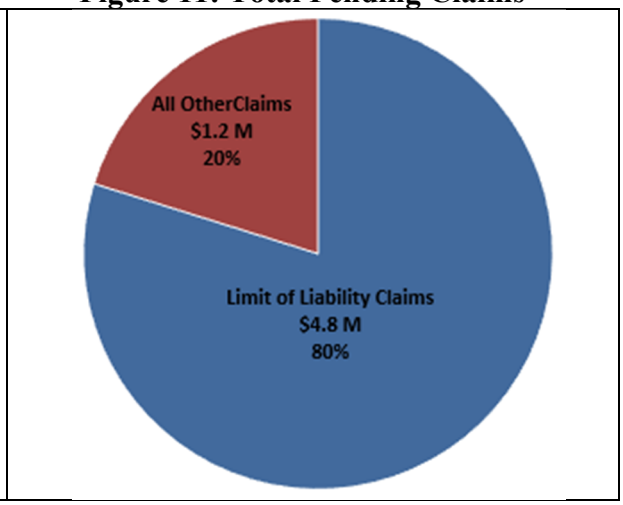


Figure 11: Total Pending Claims

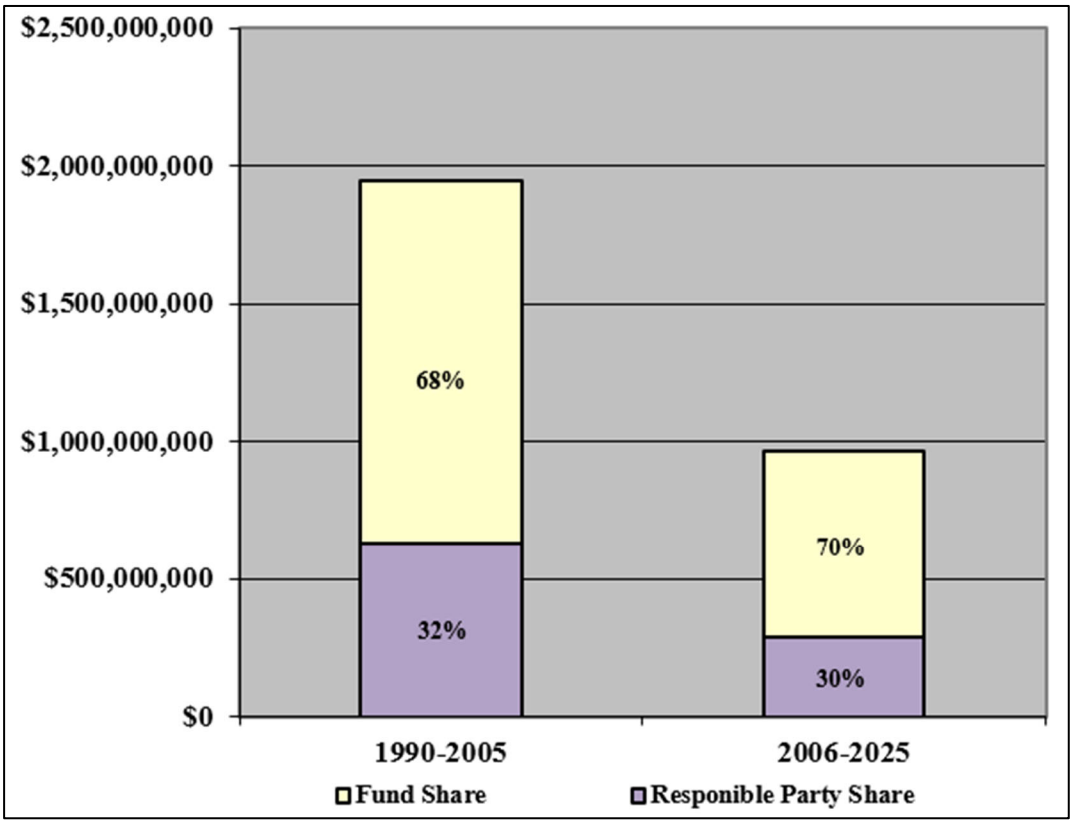


C. Recent Trends

Potential Fund impacts resulting from payments to Responsible Parties, third parties for claims, and response costs where incident costs exceeded the Responsible Party's limits of liability vary substantially from year to year but averaged approximately $58.6 million per year over the past 34 years. While the potential impact is significant, it is also useful to note that the available data show a continued trend for disproportionate Fund risk as compared to what the Responsible Party pays toward the cost of the incident.

As illustrated in Figure 12 and Appendix C, the Fund share of the risk for vessel discharges that result in estimated removal costs and claims that exceed liability limits has consistently exceeded 60 percent of total incident costs.

Figure 12: Responsible Party vs. Fund Share of Total Incident Costs



The nine cent per barrel tax on oil that is an important revenue source for the Fund was reinstated by the Consolidated Appropriations Act, 2021 (Pub. L. 116-260), which amended 26 U.S.C. § 4611 (f) and extended the Fund tax until December 31, 2025. Based on current revenue and expenditure projections, the National Pollution Funds Center forecasts that the Fund should maintain liquidity beyond 2031 (see Figure 13).

Changing energy trends may also impact Fund costs. Though the ENBRIDGE ENERGY PARTNERS LAKEHEAD LINE 6B pipeline incident is an outlier within the historic data set, the oil spilled—diluted bitumen—is known to sink in water, raising response costs. Similarly, challenges of responding to an Arctic oil spill, from either a vessel or non-vessel source, are also likely to incur higher Fund costs. Costs associated with preparedness, response mobilization, natural resource damage assessment, and recovery are often higher in remote, high-latitude regions.

V. Findings with Respect to Further Liability Limit Adjustments

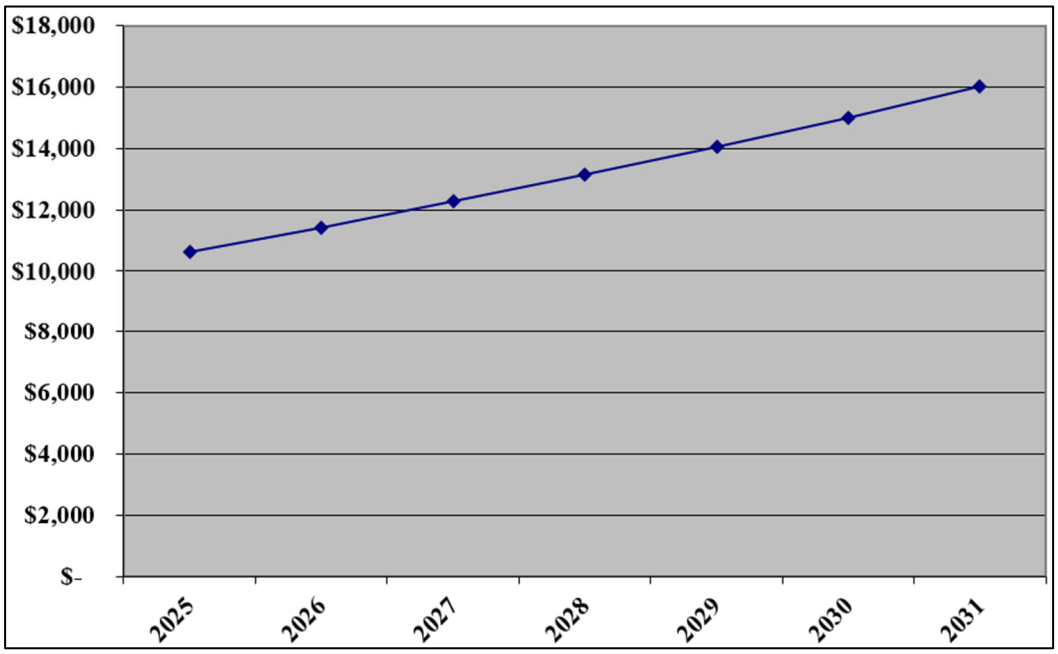
This section discusses findings, based on historical trends and analyses, and taking into account other factors impacting the Fund, on whether the liability limits need to be adjusted in order to prevent the principal of the Fund from declining to levels that are likely to be insufficient to cover expected claims.

A. Future Year Fund Outlook

The National Pollution Funds Center anticipates the Fund will cover its projected non-catastrophic liabilities, including claims, without further increases to liability limits.

Figure 13 projects the end-of-year balance of the Fund through 2031 based on estimated revenues and expenditures (no adjustment for inflation):

Figure 13: Fund Forecast Balance (Millions of Dollars)



Notably, several classes of Fund expenditures are independent of revisions to the limits of liability, such as federal removal costs and annual appropriations. The Fund provides resources to the federal government to respond to oil discharges (federal removal costs) and to compensate claimants for their removal costs and damages when a Responsible Party cannot be identified, does not respond, or does not compensate claimants. *See* Oil Pollution Act of 1990 § 1012(a)(1), (4) (33 U.S.C. § 2712(a)(1), (4)). The Fund also pays when recourse against Responsible Parties is not available, such as when a Responsible Party declares bankruptcy or cannot be identified.

Fund revenues are generally independent of revisions to the limits of liability. The primary source of revenue is an excise tax on oil. Revenue also includes interest earned on Treasury Securities held by the Fund, successful cost recoveries, and fines and penalties. The Fund Forecast follows

Office of Management and Budget guidance and uses Treasury's Office of Tax Analysis excise tax projections and semi-annual Economic Assumptions for Trust Fund interest rates. Cost recovery and fine/penalty revenue follow historical data patterns and are much less predictable over time.

Congress annually appropriates resources from the Fund to various agencies responsible for administering and enforcing the Oil Pollution Act of 1990 and provisions of the *Federal Water Pollution Control Act* (*see* Oil Pollution Act of 1990 § 1012(a)(5) (33 U.S.C. § 2712(a)(5))). Administrative and enforcement costs that are not allocable to a specific oil discharge are not recoverable from liable Responsible Parties.

Figure 14 shows total Fund expenses in recent years for agency appropriations, federal removal costs, and claims for removal costs and damages, of which claims resulting from incident-related costs exceeding the limits of liability is a subset.

Figure 14: Total Fund Expenditures (Thousands of Dollars)

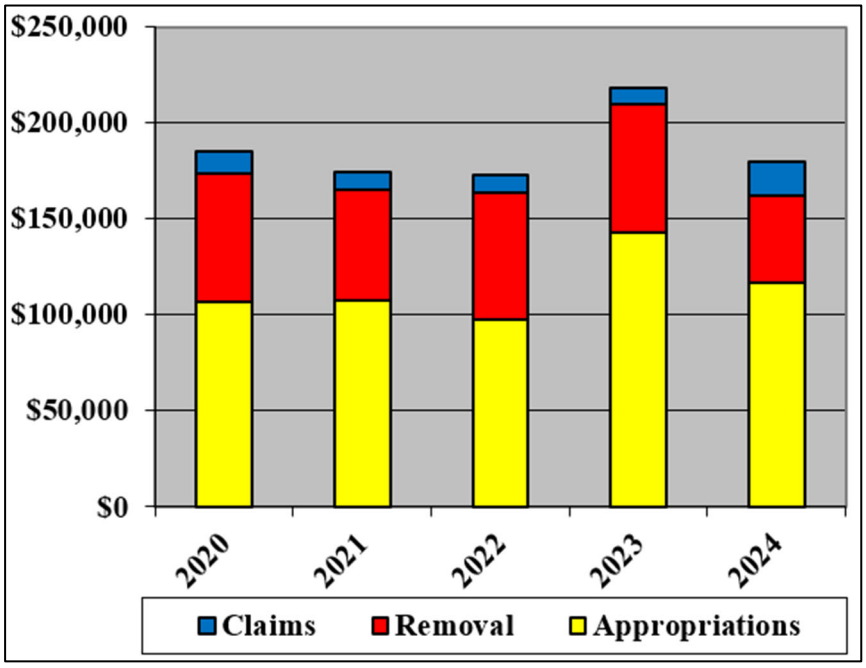


Figure 14 illustrates that from 2020 through 2024, federal removal costs and claims payments for which Responsible Parties may be liable represented only a portion of annual expenditures from the Fund. This graph displays all costs for vessel or facility discharges.

With respect to the Fund expenses for removal costs and claims allocable to vessel spills, the Fund frequently pays when a Responsible Party is unknown. In these cases, liability limits have no impact on Fund risk. Vessel and facility liability limits will affect the Fund only to the extent Responsible Parties are available and can pay.

B. Further Liability Limit Adjustments

Adjustments to liability limits help more equitably divide liabilities between the Fund and Responsible Parties. The Oil Pollution Act of 1990 is founded on the "polluter pays" principle. At the same time, the Oil Pollution Act of 1990 may limit a polluter's liability to pay for clean-up of spills. To determine the extent of the adjustments necessary, three Responsible Party cost share scenarios were analyzed for offshore facilities, onshore facilities, and vessels: a 50 percent Responsible Party cost share, where the Responsible Party and the Fund pay equal amounts towards the total incident cost[11], a 25 percent Responsible Party cost share, and a 75 percent Responsible Party cost share.[12]

Non-vessel Sources

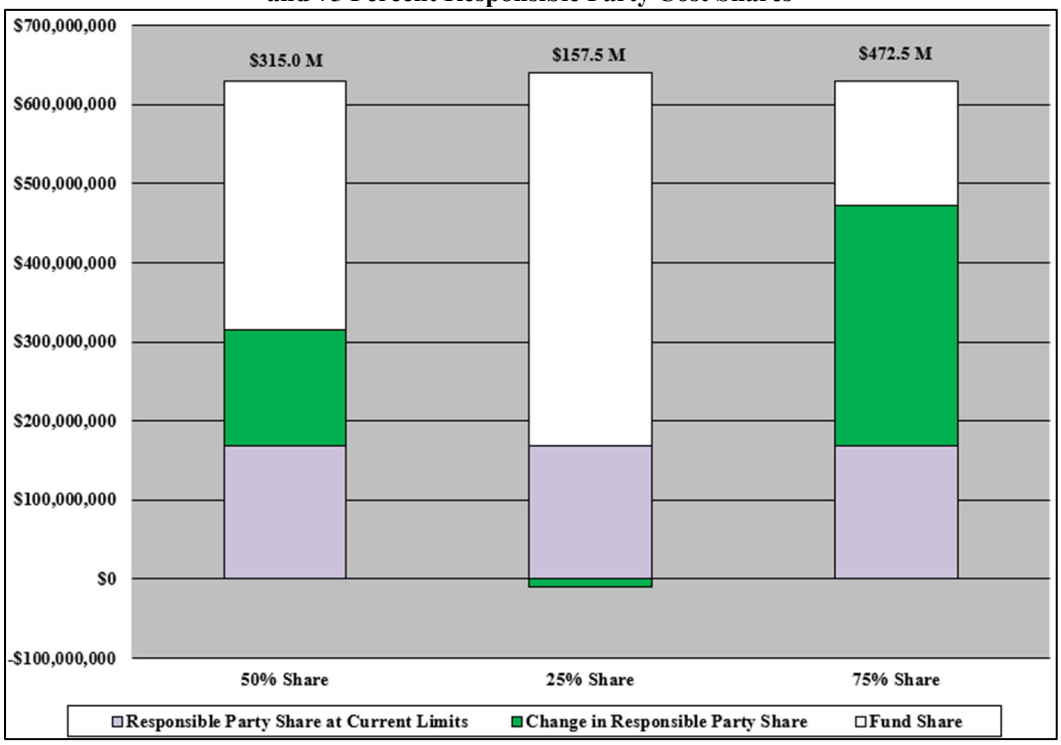
Figure 8 demonstrates that for offshore facility discharges where damages exceed current liability limits and onshore facility discharges where total incident costs exceed current liability limits, the Fund bears substantial cost even if every Responsible Party is available and pays to its limit.

[11] Or in the case of offshore facilities, damages.

[12] The 50 percent Responsible Party Cost Share Scenario has been the scenario analyzed in prior reports. In response to feedback received from the Office of Management and Budget, two additional scenarios (25 percent Responsible Party Cost Share and 75 percent Responsible Party Cost Share have also been analyzed in this report).

Figures 15 and 16 illustrate how further adjustments to the limits of liability might achieve a different sharing of that risk between Responsible Parties and the Fund for the three scenarios. The light purple-shaded area of each bar represents the Responsible Party risk at the current limits of liability. The green-shaded area represents the change in costs Responsible Parties would pay if the new limits were applied.[13] The white-shaded area of each bar represents the Fund risk at the current limits of liability.

Figure 15: Offshore Facility Liability Limits for 50 Percent, 25 Percent and 75 Percent Responsible Party Cost Shares



[13] In certain scenarios, the current limit of liability exceeds the Responsible Party share, the difference is shown beneath the x-axis of the figures.

Figure 16: Onshore Facility Liability Limits for 50 Percent, 25 Percent and 75 Percent Responsible Party Cost Shares

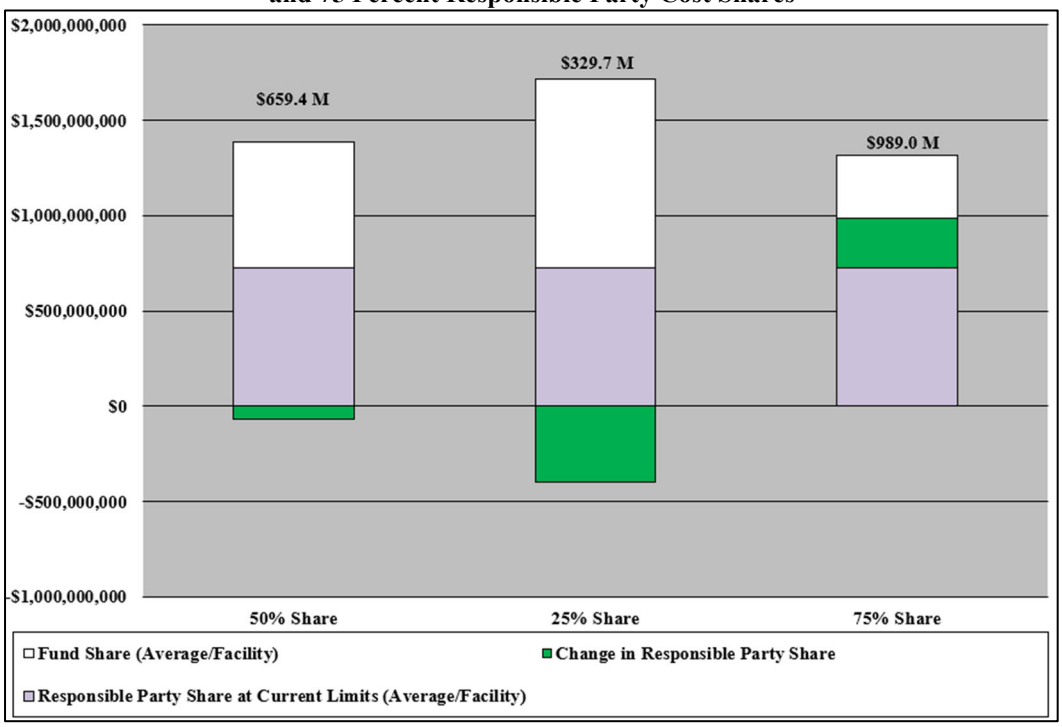


Figure 17 summarizes the three Responsible Party cost share limits and minimums scenarios and compares them to the current limits.

Figure 17: Facility Limits of Liability under the Oil Pollution Act of 1990

If the facility is an:	The limits of liability are:	But to achieve a different Responsible Party cost share, limits of liability would need to be changed to:
Offshore Facility	All removal costs + $167.8 million for damages	50 percent Responsible Party Share: All Removal Costs + $315.0 million for damages 25 percent Responsible Party Share: All Removal Costs + $157.5 million for damages 75 percent Responsible Party Share: All Removal Costs + $472.5 million for damages
Onshore Facility	$725.7 million	50 percent Responsible Party Share: $659.4 million 25 percent Responsible Party Share: $329.7 million 75 percent Responsible Party Share: $989.0 million

This analysis indicates that the current limit of liability for offshore facilities is not adequate at either the 50 percent or 75 percent Responsible Party cost share levels. The current limit of liability for onshore facilities is not adequate at the 75 percent Responsible Party cost share level.

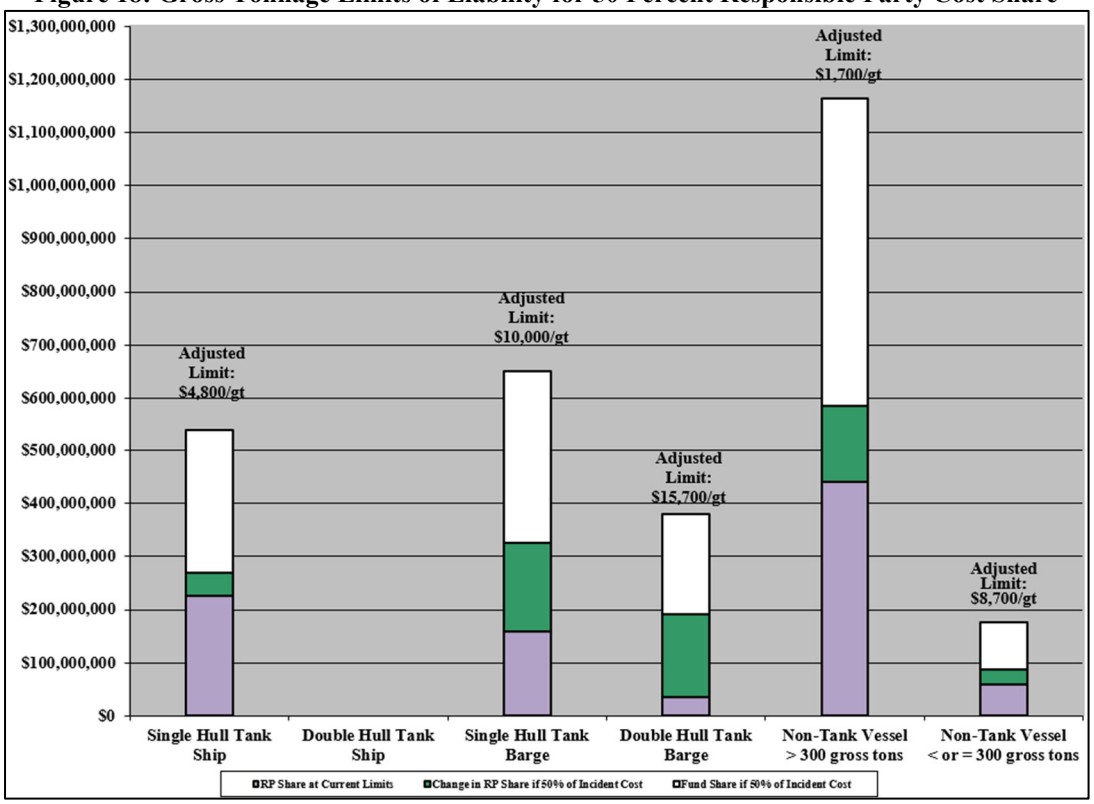
Vessel Sources

This analysis indicates establishing different liability limits for non-tank vessels, including fishing, cargo, and other self-propelled vessels, by tonnage (*i.e.*, greater than 300 gross tons and less than or equal to 300 gross tons) would provide more reasonable limits on smaller vessels.

Figure 9 demonstrates that for vessel discharges where removal costs and damages exceed current liability limits, the Fund bears most of the cost even if every Responsible Party is available and pays to its limit. Figures 18-23 illustrate how further adjustments to the limits of liability might achieve a different sharing of that risk between Responsible Parties and the Fund for the three aforementioned scenarios. The light-purple shaded area of each bar represents the Responsible Party risk at the current limits of liability. The green-shaded area represents the change in costs Responsible Parties would pay if the new limits were applied[14] The white-shaded area of each bar represents the Fund risk at the current limits of liability.

Figure 18 illustrates how further adjustments to limits of liability per gross ton might achieve a 50 percent Responsible Party cost share of the total incident costs.

Figure 18: Gross Tonnage Limits of Liability for 50 Percent Responsible Party Cost Share



For example, in the 50 percent Responsible Party cost share scenario, liability limits for single hull tank ships would increase to $4,800 per gross ton, single hull tank barges to $10,000 per gross ton, double hull tank barges to $15,700 per gross ton, non-tank vessels greater than 300 gross tons to $1,700 per gross ton, and non-tank vessels less than or equal to 300 gross tons to $8,700 per gross ton.

[14] In certain scenarios, the current limit of liability exceeds the Responsible Party share, the difference is shown beneath the x-axis of the figures.

Figure 19 indicates the minimum amount a Responsible Party would be expected to pay for an incident (based on average historical costs of incidents by vessel type in 2025 dollars) if the limits of liability were adjusted so that costs so that the Responsible Party paid 50 percent of the incident costs

Figure 19: Minimum Liability Limits for 50 Responsible Party Percent Cost Share

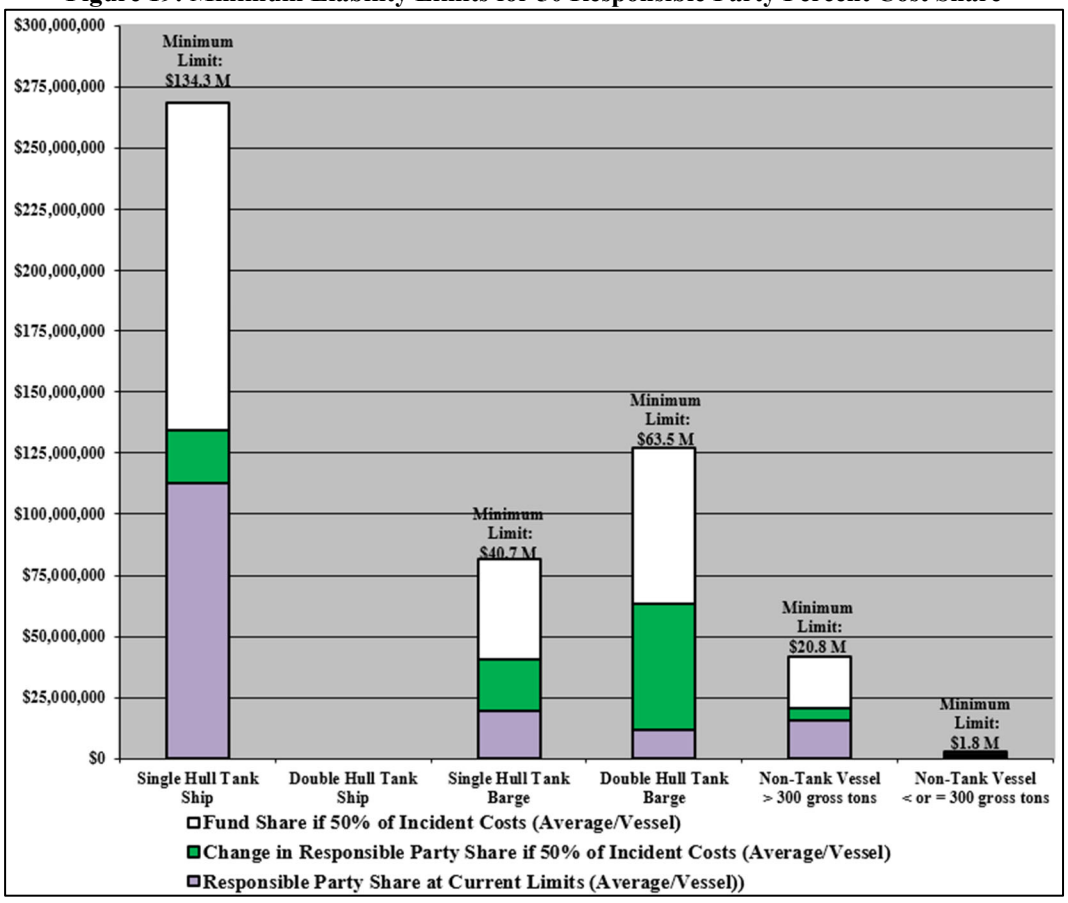


Figure 20 illustrates how further adjustments to limits of liability per gross ton might achieve a 25 percent Responsible Party cost share of the total incident costs.

Figure 20: Gross Tonnage Limits of Liability for 25 Percent Responsible Party Cost Share

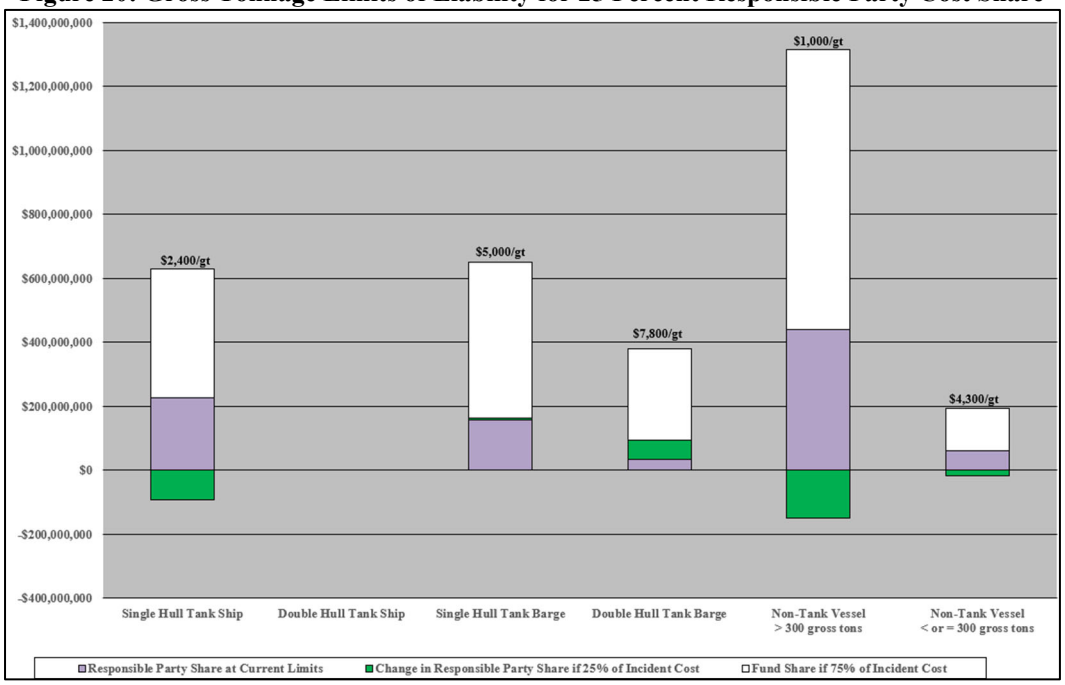


Figure 21 indicates the minimum amount a Responsible Party would be expected to pay for an incident (based on average historical costs of incidents by vessel type in 2025 dollars) if the limits of liability were adjusted so that the Responsible Party paid 25 percent of the incident costs

Figure 21: Minimum Liability Limits for 25 Percent Responsible Party Cost Share

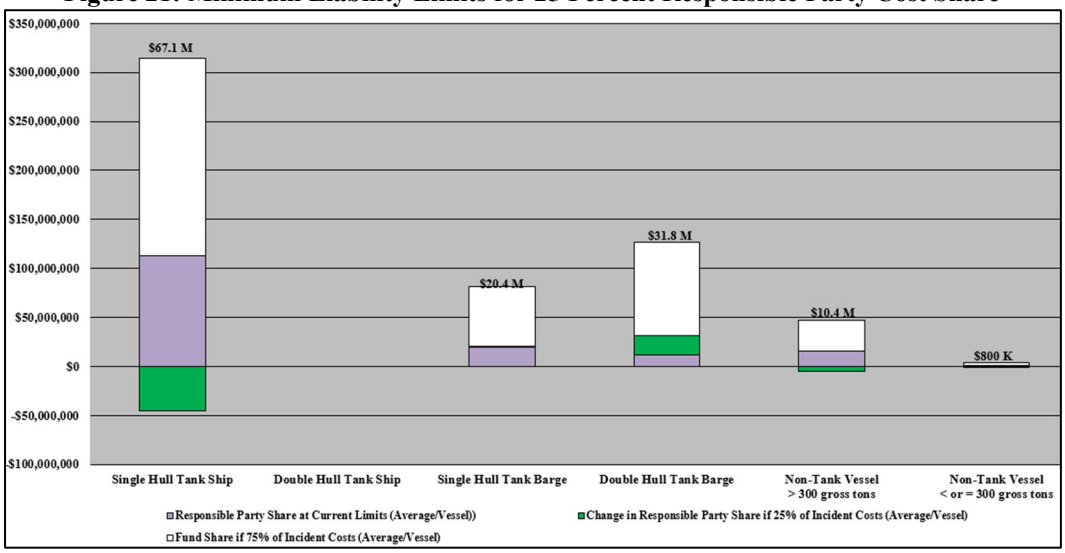


Figure 22 illustrates how further adjustments to limits of liability per gross ton might achieve a 75 percent Responsible Party Share of the total incident costs.

Figure 22: Gross Tonnage Limits of Liability for 75 Percent Responsible Party Cost Share

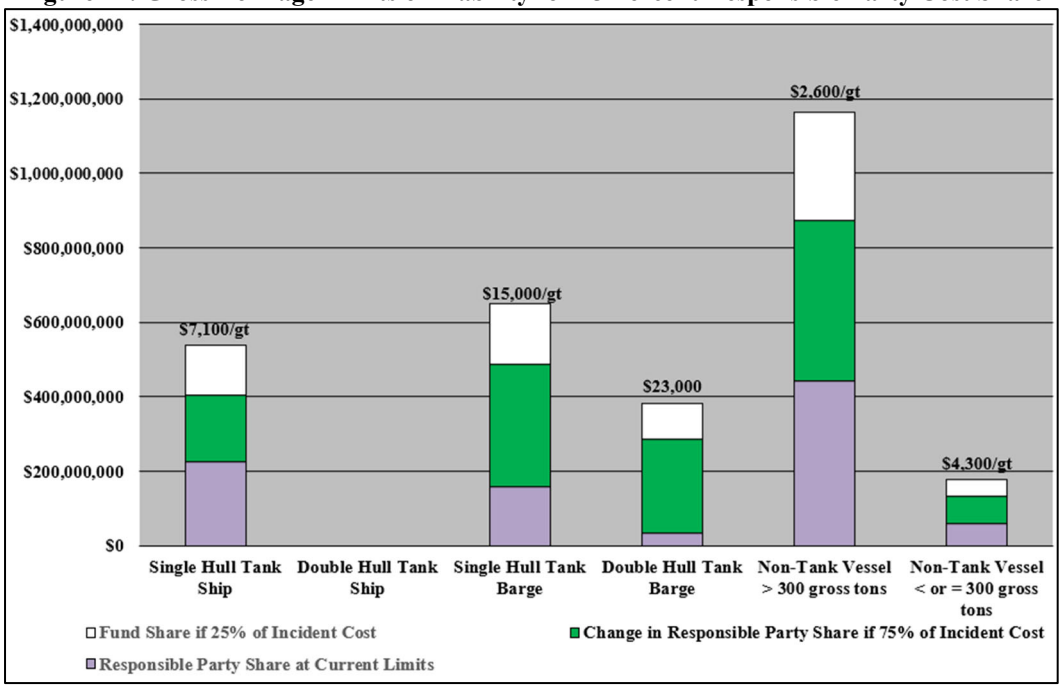


Figure 23 indicates the minimum amount a Responsible Party would be expected to pay for an incident (based on average historical costs of incidents by vessel type in 2025 dollars) if the limits of liability were adjusted so that the Responsible Party paid 75 percent of the incident costs.

Figure 23: Minimum Liability Limits for 75 Percent Responsible Party Cost Share

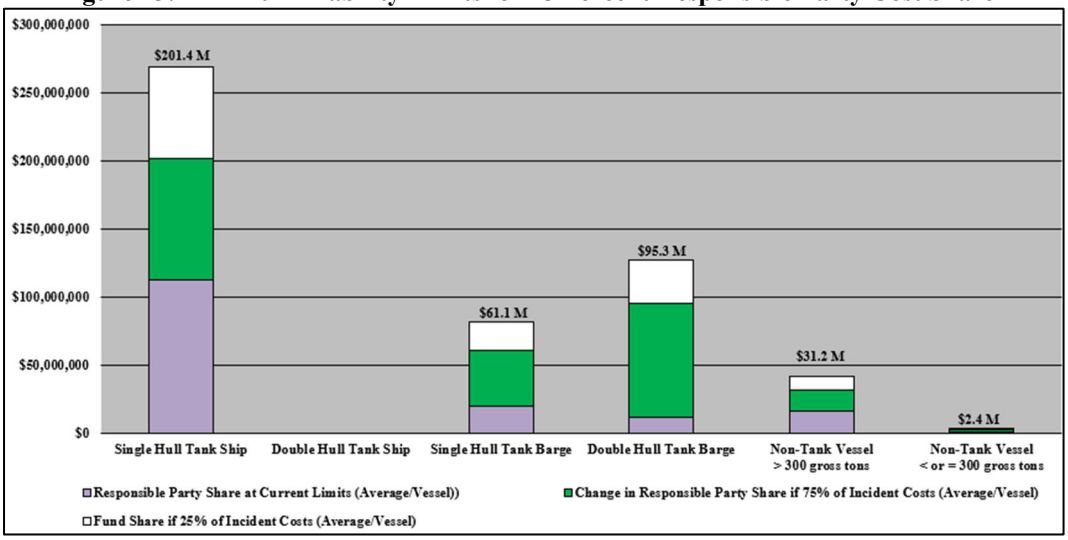


Figure 24 summarizes the three Responsible Parties **c**ost share limits and minimums scenarios and compares them to the current limits.

Appendix D illustrates how these limits would protect the Fund from paying most of the total incident cost when applied to the 97 incidents discussed earlier. The current limits distinguish between single hull tank vessels, double hull tank vessels, and non-tank (other) vessels. As discussed in Section II, however, analysis suggests subdividing these categories as follows: categories of Tank Ship and Tank Barge are addressed separately as subsets of single and double hull Tank Vessel, and the Non-Tank Vessel category is divided between vessels greater than 300 gross tons and vessels less than or equal to 300 gross tons.[15]

Figure 24: Vessel Limits of Liability under the Oil Pollution Act of 1990

If the vessel is a. . .		The limits of liability are the greater of:	But to achieve a different Responsible Party cost share, limits of liability would need to be changed to:
Tank Ship	With a single hull, double sides only, or double bottom only	Greater than 3,000 gross tons: $4,000 per gross ton or $29,591,300 Less than or equal to 3,000 gross tons: $4,000 per gross ton or $8,070,400	50 percent Responsible Parties Cost Share: $4,800 per gross ton or $134.3 million 25 percent Responsible Parties Cost Share: $2,400 per gross ton or $67.1 million 75 percent Responsible Parties Cost Share: $7,100 per gross ton or $201.4 million
	With a double hull	Greater than 3,000 gross tons: $2,500 per gross ton or $21,521,000 Less than or equal to 3,000 gross tons: $2,500 per gross ton or $5,380,300	No data[16]
Tank Barge	With a single hull, double sides only, or double bottom only	Greater than 3,000 gross tons: $4,000 per gross ton or $29,591,300 Less than or equal to 3,000 gross tons: $4,000 per gross ton or $8,070,400	50 percent Responsible Parties Cost Share: $10,000 per gross ton or $40.7 million 25 percent Responsible Parties Cost Share: $5,000 per gross ton or $20.4 million 75 percent Responsible Parties Cost Share: $15,000 per gross ton or $61.1 million
	With a double hull	Greater than 3,000 gross tons: $2,500 per gross ton or $21,521,000 Less than or equal to 3,000 gross tons: $2,500 per gross ton or $5,380,300	50 percent Responsible Parties Cost Share $15,700 per gross ton or $63.5 million 25 percent Responsible Parties Cost Share: $7,800 per gross ton or $31.8 million 75 percent Responsible Parties Cost Share: $23,500 per gross ton or $95.3 million
Non-Tank Vessel	Greater than 300 gross tons	$1,300 per gross ton or $1,076,000	50 percent Responsible Parties Cost Share: $1,700 per gross ton or $20.8 million 25 percent Responsible Parties Cost Share: $1,000 per gross ton or $10.4 million 75 percent Responsible Parties Cost Share: $2,600 per gross ton or $31.2 million
	Less than or equal to 300 gross tons	$1,300 per gross ton or $1,076,000	50 percent Responsible Parties Cost Share: $8,700 per gross ton or $1.8 million 25 percent Responsible Parties Share: $4,300 per gross ton or $800 k 75 percent Responsible Parties Share: $13,000 per gross ton or $2.4 million

[15] The comparative results for single and double hull tank barges may appear incongruous at first glance. While double hull vessels may be safer and less likely to spill oil, the data show that a catastrophic discharge from a double hull tank barge can be just as expensive as one from a single hull tank barge.

[16] There have been no historical double hull tank ship incidents that have met criteria for inclusion in this report.

Appendix A: Incidents Exceeding Liability Limits by Facility Type

Facility Type: Offshore Facility

Facility Name	Incident Year	Incident Location	Total Incident Damages	Inflation Factor	Total Incident Damages (2025 Dollars)	Limits of Liability	Fund Exposure (Damages)	Actual Fund Costs Incurred
DEEPWATER HORIZON	2010	LA	$428,600,000	1.47	$630,042,000	$167,807,000	$462,235,000	$1,245,270,000
Total			**$428,600,000**		**$630,042,000**	**$167,807,000**	**$462,235,000**	**$1,245,270,000**

Facility Type: Onshore Facility

Facility Name	Incident Year	Incident Location	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred
ENBRIDGE ENERGY PARTNERS LAKEHEAD LINE 6B	2010	MI	$1,200,000,000	1.47	$1,764,000,000	$725,711,000	$1,038,289,000	$65,764,000
TC ENERGY MILESTONE 14	2022	KS	$794,000,000	1.10	$873,400,000	$725,711,000	$147,689,000	$83,000
Total			**$1,994,000,000**		**$2,637,400,000**	**$1,451,422,000**	**$1,185,978,000**	**$65,847,000**

Appendix B: Incidents Exceeding Liability Limits by Vessel Type

Vessel Type: Tank Ship (Single Hull)

Vessel Name	Incident Year	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred
T/V JULIE N	1996	ME	18,500	$52,601,200	2.05	$107,832,000	$73,908,000	$33,924,000	$28,376,000
T/V ATHOS I	2004	NJ	37,900	$252,502,100	1.70	$429,254,000	$151,580,000	$277,674,000	$210,557,000
Total						**$537,086,000**	**$225,488,000**	**$311,598,000**	**$238,933,000**

Vessel Type: Tank Barge (Single Hull)

Vessel Name	Incident Year	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred
T/B VISTABELLA	1991	PR	1,100	$5,613,700	2.37	$13,305,000	$8,070,000	$5,234,000	$4,782,000
T/B (TAMPA BAY COLLISION)	1993	FL	9,300	$68,900,000	2.23	$153,647,000	$37,048,000	$116,599,000	$2,397,000
T/B MORRIS J. BERMAN	1994	PR	5,400	$95,488,300	2.18	$208,164,000	$29,591,000	$178,573,000	$95,488,000
M/V SCANDIA & T/B NORTH CAPE	1996	RI	5,500	$49,000,000	2.05	$100,450,000	$29,591,000	$70,859,000	$9,046,000
T/B BUFFALO #292	1996	TX	1,500	$15,776,900	2.05	$32,343,000	$8,070,000	$24,272,000	$16,810,000
T/B B NO. 120	2003	MA	6,900	$58,572,600	1.75	$102,502,000	$29,591,000	$72,911,000	$1,753,000
T/B EMC 423	2005	IL	1,400	$10,188,600	1.65	$16,811,000	$8,070,000	$8,741,000	$10,189,000
BOSTON 30	2012	NY	1,600	$17,170,700	1.40	$24,039,000	$8,070,000	$15,969,000	$8,818,000
Total						**$651,261,000**	**$158,104,000**	**$493,157,000**	**$149,283,000**

Vessel Type: Tank Barge (Double Hull)

Vessel Name	Incident Year	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred
T/B DBL 152	2005	LA	9,700	$51,556,200	1.65	$85,068,000	$24,353,000	$60,715,000	$24,621,000
T/B DM932	2008	LA	800	$104,460,700	1.48	$154,602,000	$5,380,000	$149,222,000	$23,406,000
KIRBY 27706	2014	TX	1,600	$104,700,200	1.35	$141,345,000	$5,380,000	$135,965,000	$5,090,000
Total						**$381,015,000**	**$35,113,000**	**$345,902,000**	**$53,117,000**

Vessel Type: Fishing Vessel

Vessel Name	Incident Year	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred
F/V TENYO MARU	1991	WA	4,200	$6,062,900	2.37	$14,369,000	$5,417,000	$8,952,000	$6,063,000
F/V JIN SHIANG FA	1993	AS	400	$2,013,000	2.23	$4,489,000	$1,076,000	$3,413,000	$2,420,000
F/V YU TE NO. 1	1999	AS	200	$1,164,600	1.93	$2,248,000	$1,076,000	$1,172,000	$5,296,000
F/V AMIGA NO. 5	1999	AS	200	$3,355,700	1.93	$6,477,000	$1,076,000	$5,401,000	$2,766,000
F/V KWANG MYONG	1999	AS	200	$1,554,800	1.93	$3,001,000	$1,076,000	$1,925,000	$965,000
F/V KORAM NO. 3	1999	AS	200	$1,403,100	1.93	$2,708,000	$1,076,000	$1,632,000	$813,000

Vessel Type: Fishing Vessel

Vessel Name	Incident Year	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred
F/V KWANG MYONG NO 72	1999	AS	200	$2,182,900	1.93	$4,213,000	$1,076,000	$3,137,000	$1,593,000
F/V KWANG MYONG NO 58	1999	AS	200	$1,557,600	1.93	$3,006,000	$1,076,000	$1,930,000	$967,000
F/V KORAM NO 1	1999	AS	200	$1,378,400	1.93	$2,660,000	$1,076,000	$1,584,000	$788,000
F/V KWANG MYONG NO 51	1999	AS	200	$1,249,200	1.93	$2,411,000	$1,076,000	$1,335,000	$659,000
F/V JESSICA ANN	2000	ME	200	$947,000	1.87	$1,771,000	$1,076,000	$695,000	$947,000
F/V SWORDMAN I	2000	HI	100	$1,528,600	1.87	$2,859,000	$1,076,000	$1,783,000	$1,529,000
F/V WINDY BAY	2001	AK	400	$3,396,400	1.81	$6,147,000	$1,076,000	$5,071,000	$3,396,000
F/V VANGUARD	2001	AK	200	$699,800	1.81	$1,267,000	$1,076,000	$191,000	$700,000
F/V GENEI MARU #7	2002	AK	100	$869,800	1.79	$1,557,000	$1,076,000	$481,000	$870,000
F/V TERESA LYNN	2002	FL	200	$690,800	1.79	$1,237,000	$1,076,000	$161,000	$691,000
F/V CONNIE MARIE	2003	CA	100	$647,300	1.75	$1,133,000	$1,076,000	$57,000	$5,000
F/V NEW HORIZON	2004	CA	100	$805,300	1.70	$1,369,000	$1,076,000	$293,000	$305,000
F/V MWALIL SAAT	2004	GU	200	$3,413,500	1.70	$5,803,000	$1,076,000	$4,727,000	$3,414,000
F/V THE BOSS	2004	OR	200	$926,100	1.70	$1,574,000	$1,076,000	$498,000	$926,000
F/V MILKY WAY	2005	WA	200	$1,005,100	1.65	$1,658,000	$1,076,000	$582,000	$539,000
CAPT MIKE	2009	LA	100	$2,413,400	1.50	$3,620,000	$1,076,000	$2,544,000	$2,413,000
F/V MAR-GUN	2009	AK	200	$1,442,500	1.50	$2,164,000	$1,076,000	$1,088,000	$199,000
DEEP SEA	2012	WA	200	$3,015,600	1.40	$4,222,000	$1,076,000	$3,146,000	$3,024,000
F/V LONE STAR	2013	AK	100	$3,398,400	1.38	$4,690,000	$1,076,000	$3,614,000	$3,398,000
DAIKI MARU 7	2014	GU	100	$1,550,000	1.35	$2,093,000	$1,076,000	$1,017,000	$63,000
F/V PACIFIC PARADISE	2017	HI	200	$2,500,000	1.31	$3,275,000	$1,076,000	$2,199,000	$1,657,000
PAPPYS PRIDE	2020	TX	200	$969,000	1.25	$1,211,000	$1,076,000	$135,000	$969,000
F/V AMERICAN CHALLENGER	2021	CA	200	$13,780,800	1.19	$16,399,000	$1,076,000	$15,323,000	$13,781,000
F/V ST PATRICK	2021	AK	200	$4,655,800	1.19	$5,540,000	$1,076,000	$4,464,000	$4,656,000
ALEUTIAN ISLE	2022	WA	200	$6,294,500	1.10	$6,924,000	$1,076,000	$5,848,000	$6,295,000
Total						**$122,093,000**	**$37,697,000**	**$84,396,000**	**$72,105,000**

Vessel Type: Cargo/Other SPV

Vessel Name	Incident Year	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred
M/V CITRUS	1996	AK	3,500	$7,739,900	2.05	$15,867,000	$4,541,000	$11,326,000	$433,000
M/V KUROSHIMA	1997	AK	4,200	$19,702,600	2.01	$39,602,000	$5,408,000	$34,194,000	$17,540,000
M/V KURE	1997	CA	36,000	$47,218,900	2.01	$94,910,000	$46,812,000	$48,098,000	$711,000
M/V NEW CARISSA	1999	OR	36,600	$50,501,400	1.93	$97,468,000	$47,542,000	$49,925,000	$26,775,000
M/V STUYVESANT	1999	CA	7,100	$11,700,000	1.93	$22,581,000	$9,244,000	$13,337,000	$379,000
M/V SERGO ZAKARIADZE	1999	PR	16,500	$15,966,700	1.93	$30,816,000	$21,453,000	$9,363,000	$6,065,000
SS J LUCKENBACH	2001	CA	7,900	$42,487,000	1.81	$76,901,000	$10,230,000	$66,672,000	$47,815,000
M/V KIMTON	2001	PR	200	$713,700	1.81	$1,292,000	$1,076,000	$216,000	$714,000
VICTORIA ROSE HUNT	2003	MA	100	$1,085,700	1.75	$1,900,000	$1,076,000	$824,000	$94,000

Vessel Type: Cargo/Other SPV

Vessel Name	Incident Year	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred
M/V RED DIAMOND	2003	FL	200	$2,595,200	1.75	$4,542,000	$1,076,000	$3,466,000	$2,595,000
CRANE BARGE MONARCH	2003	CA	200	$2,481,700	1.75	$4,343,000	$1,076,000	$3,267,000	$2,482,000
M/V BOWSTRING	2003	FL	300	$1,606,500	1.75	$2,811,000	$1,076,000	$1,735,000	$1,606,000
M/V SELENDANG AYU	2004	AK	39,800	$132,583,300	1.70	$225,392,000	$51,682,000	$173,710,000	$102,384,000
M/V ORIENTAL I	2004	FL	200	$727,400	1.70	$1,237,000	$1,076,000	$161,000	$727,000
ALBION	2005	CA	200	$1,207,100	1.65	$1,992,000	$1,076,000	$916,000	$1,207,000
M/V CASITAS	2005	HI	300	$1,710,700	1.65	$2,823,000	$1,076,000	$1,747,000	$1,711,000
MAMA LERE	2006	TX	400	$1,217,300	1.59	$1,935,000	$1,076,000	$859,000	$1,217,000
M/V COSCO BUSAN	2007	CA	65,100	$102,000,000	1.55	$158,100,000	$84,670,000	$73,430,000	$4,208,000
M/V SENECA	2007	MI	200	$1,211,000	1.55	$1,877,000	$1,076,000	$801,000	$1,211,000
LST-1166	2007	OR	2,400	$5,151,000	1.55	$7,984,000	$3,143,000	$4,841,000	$5,151,000
CATALA	2007	WA	5,700	$6,138,500	1.55	$9,515,000	$7,410,000	$2,105,000	$6,138,000
C/V SEA WITCH	2008	MD	17,900	$20,629,900	1.48	$30,532,000	$23,273,000	$7,260,000	$20,630,000
BIG BOY & SCOOBY DOO	2008	PA	200	$1,010,800	1.48	$1,496,000	$1,076,000	$420,000	$1,011,000
WENONAH	2009	CA	300	$947,800	1.50	$1,422,000	$1,076,000	$346,000	$948,000
SOUND DEVELOPER	2009	AK	200	$1,657,100	1.50	$2,486,000	$1,076,000	$1,410,000	$1,657,000
MONARCH	2009	AK	300	$2,097,500	1.50	$3,146,000	$1,076,000	$2,070,000	$1,333,000
M/V PRINCESS KATHLEEN	2010	AK	5,900	$14,185,900	1.47	$20,853,000	$7,638,000	$13,216,000	$14,186,000
DAVY CROCKETT	2011	WA	4,600	$22,457,500	1.42	$31,890,000	$6,036,000	$25,854,000	$22,458,000
TUG TIGER	2011	CA	200	$4,205,500	1.42	$5,972,000	$1,076,000	$4,896,000	$4,205,000
JIREH	2012	PR	1,000	$16,514,100	1.40	$23,120,000	$1,273,000	$21,847,000	$16,518,000
RESPECT	2013	CA	200	$2,467,600	1.38	$3,405,000	$1,076,000	$2,329,000	$2,468,000
STEPHEN L. COLBY	2013	IA	200	$1,355,600	1.38	$1,871,000	$1,076,000	$795,000	$1,356,000
M/V CHALLENGER	2015	AK	100	$2,541,200	1.35	$3,431,000	$1,076,000	$2,355,000	$2,541,000
SPIRIT OF SACRAMENTO	2016	CA	100	$1,514,800	1.34	$2,030,000	$1,076,000	$954,000	$1,515,000
TUG TUTAHACO	2017	FL	200	$4,000,000	1.31	$5,240,000	$1,076,000	$4,164,000	$2,715,000
M/V AKUTAN	2017	AK	700	$968,000	1.31	$1,268,000	$1,076,000	$192,000	$968,000
AKUTAN	2017	AK	700	$949,800	1.31	$1,244,000	$1,076,000	$168,000	$950,000
POWHATAN	2017	AK	200	$7,072,700	1.31	$9,265,000	$1,076,000	$8,189,000	$3,032,000
SS PETER STUYVESANT	2017	MA	1,700	$2,400,000	1.31	$3,144,000	$2,237,000	$907,000	$109,000
D-B VENGEANCE	2017	CA	400	$1,929,700	1.31	$2,528,000	$1,076,000	$1,452,000	$127,000
M/V OCEAN KING	2018	MA	200	$1,436,600	1.28	$1,839,000	$1,076,000	$763,000	$1,046,000
S-2006	2018	MP	1,000	$8,554,000	1.28	$10,949,000	$1,244,000	$9,705,000	$8,554,000
GRAND MARIANA I	2018	MP	400	$3,310,700	1.28	$4,238,000	$1,076,000	$3,162,000	$1,461,000
GATE CITY	2018	WV	200	$1,857,000	1.28	$2,377,000	$1,076,000	$1,301,000	$1,857,000
F/V PACIFIC KNIGHT	2018	AK	200	$1,297,800	1.28	$1,661,000	$1,076,000	$585,000	$1,298,000
YP 702	2018	GA	200	$1,544,800	1.28	$1,977,000	$1,076,000	$901,000	$1,545,000

Vessel Type: Cargo/Other SPV

Vessel Name	Incident Year	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred
L/B RAM XVIII	2018	LA	800	$4,789,300	1.28	$6,130,000	$1,066,000	$5,064,000	$0
GOLDEN RAY	2019	GA	71,200	$175,000,000	1.26	$220,500,000	$92,531,000	$127,969,000	$7,481,000
F/V MIDWAY ISLAND	2020	HI	200	$1,387,400	1.25	$1,734,000	$1,076,000	$658,000	$1,387,000
WESTERN MARINER	2022	AK	100	$2,149,600	1.10	$2,365,000	$1,076,000	$1,289,000	$565,000
M/V ALERT	2022	OR	200	$1,486,900	1.10	$1,636,000	$1,076,000	$560,000	$1,487,000
TUG MAZAPETA	2023	CA	200	$3,092,500	1.06	$3,278,000	$1,076,000	$2,202,000	$3,093,000
OBSESSION	2024	PR	200	$3,040,500	1.02	$3,101,000	$1,076,000	$2,025,000	$2,985,000
Total						**$1,220,013,000**	**$464,016,000**	**$755,997,000**	**$362,646,000**

Grand Total						**$2,911,468,000**	**$920,418,000**	**$1,991,050,000**	**$876,084,000**

Appendix C: Incidents Exceeding Liability Limits by Incident Date

Incident Year: 1991

Vessel Type	Vessel Name	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred
Fishing Vessel	F/V TENYO MARU	WA	4,200	$6,062,900	2.37	$14,369,000	$5,417,000	$8,952,000	$6,063,000
Tank Barge (Single Hull)	T/B VISTABELLA	PR	1,100	$5,613,700	2.37	$13,305,000	$8,070,000	$5,234,000	$4,782,000
TOTAL						**$27,674,000**	**$13,487,000**	**$14,186,000**	**$10,845,000**

Incident Year: 1993

Fishing Vessel	F/V JIN SHIANG FA	AS	400	$2,013,000	2.23	$4,489,000	$1,076,000	$3,413,000	$2,420,000
Tank Barge (Single Hull)	T/B (TAMPA BAY COLLISION)	FL	9,300	$68,900,000	2.23	$153,647,000	$37,048,000	$116,599,000	$2,397,000
TOTAL						**$158,136,000**	**$38,124,000**	**$120,012,000**	**$4,817,000**

Incident Year: 1994

Tank Barge (Single Hull)	T/B MORRIS J. BERMAN	PR	5,400	$95,488,300	2.18	$208,164,000	$29,591,000	$178,573,000	$95,488,000
TOTAL						**$208,164,000**	**$29,591,000**	**$178,573,000**	**$95,488,000**

Incident Year: 1996

Tank Barge (Single Hull)	M/V SCANDIA & T/B NORTH CAPE	RI	5,500	$49,000,000	2.05	$100,450,000	$29,591,000	$70,859,000	$9,046,000
Tank Barge (Single Hull)	T/B BUFFALO #292	TX	1,500	$15,776,900	2.05	$32,343,000	$8,070,000	$24,272,000	$16,810,000
Tank Ship (Single Hull)	T/V JULIE N	ME	18,500	$52,601,200	2.05	$107,832,000	$73,908,000	$33,924,000	$28,376,000
Cargo/Other SPV	M/V CITRUS	AK	3,500	$7,739,900	2.05	$15,867,000	$4,541,000	$11,326,000	$433,000
TOTAL						**$256,492,000**	**$116,110,000**	**$140,381,000**	**$54,665,000**

Incident Year: 1997

Cargo/Other SPV	M/V KUROSHIMA	AK	4,200	$19,702,600	2.01	$39,602,000	$5,408,000	$34,194,000	$17,540,000
Cargo/Other SPV	M/V KURE	CA	36,000	$47,218,900	2.01	$94,910,000	$46,812,000	$48,098,000	$711,000
TOTAL						**$134,512,000**	**$52,220,000**	**$82,292,000**	**$18,251,000**

Incident Year: 1999

Vessel Type	Project Name	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred
Cargo/Other SPV	M/V NEW CARISSA	OR	36,600	$50,501,400	1.93	$97,468,000	$47,542,000	$49,925,000	$26,775,000
Cargo/Other SPV	M/V STUYVESANT	CA	7,100	$11,700,000	1.93	$22,581,000	$9,244,000	$13,337,000	$379,000
Cargo/Other SPV	M/V SERGO ZAKARIADZE	PR	16,500	$15,966,700	1.93	$30,816,000	$21,453,000	$9,363,000	$6,065,000
Fishing Vessel	F/V YU TE NO. 1	AS	200	$1,164,600	1.93	$2,248,000	$1,076,000	$1,172,000	$5,296,000
Fishing Vessel	F/V AMIGA NO. 5	AS	200	$3,355,700	1.93	$6,477,000	$1,076,000	$5,401,000	$2,766,000
Fishing Vessel	F/V KWANG MYONG	AS	200	$1,554,800	1.93	$3,001,000	$1,076,000	$1,925,000	$965,000
Fishing Vessel	F/V KORAM NO. 3	AS	200	$1,403,100	1.93	$2,708,000	$1,076,000	$1,632,000	$813,000
Fishing Vessel	F/V KWANG MYONG NO 72	AS	200	$2,182,900	1.93	$4,213,000	$1,076,000	$3,137,000	$1,593,000
Fishing Vessel	F/V KWANG MYONG NO 58	AS	200	$1,557,600	1.93	$3,006,000	$1,076,000	$1,930,000	$967,000
Fishing Vessel	F/V KORAM NO 1	AS	200	$1,378,400	1.93	$2,660,000	$1,076,000	$1,584,000	$788,000
Fishing Vessel	F/V KWANG MYONG NO 51	AS	200	$1,249,200	1.93	$2,411,000	$1,076,000	$1,335,000	$659,000
TOTAL						**$177,589,000**	**$86,847,000**	**$90,741,000**	**$47,066,000**

Incident Year: 2000

Fishing Vessel	F/V JESSICA ANN	ME	200	$947,000	1.87	$1,771,000	$1,076,000	$695,000	$947,000
Fishing Vessel	F/V SWORDMAN I	HI	100	$1,528,600	1.87	$2,859,000	$1,076,000	$1,783,000	$1,529,000
TOTAL						**$4,630,000**	**$2,152,000**	**$2,478,000**	**$2,476,000**

Incident Year: 2001

Cargo/Other SPV	SS J LUCKENBACH	CA	7,900	$42,487,000	1.81	$76,901,000	$10,230,000	$66,672,000	$47,815,000
Cargo/Other SPV	M/V KIMTON	PR	200	$713,700	1.81	$1,292,000	$1,076,000	$216,000	$714,000
Fishing Vessel	F/V WINDY BAY	AK	400	$3,396,400	1.81	$6,147,000	$1,076,000	$5,071,000	$3,396,000
Fishing Vessel	F/V VANGUARD	AK	200	$699,800	1.81	$1,267,000	$1,076,000	$191,000	$700,000
TOTAL						**$85,607,000**	**$13,458,000**	**$72,150,000**	**$52,625,000**

Incident Year: 2002

Fishing Vessel	F/V GENEI MARU #7	AK	100	$869,800	1.79	$1,557,000	$1,076,000	$481,000	$870,000
Fishing Vessel	F/V TERESA LYNN	FL	200	$690,800	1.79	$1,237,000	$1,076,000	$161,000	$691,000
TOTAL						**$2,794,000**	**$2,152,000**	**$642,000**	**$1,561,000**

Incident Year: 2003

Cargo/Other SPV	VICTORIA ROSE HUNT	MA	100	$1,085,700	1.75	$1,900,000	$1,076,000	$824,000	$94,000
Cargo/Other SPV	M/V RED DIAMOND	FL	200	$2,595,200	1.75	$4,542,000	$1,076,000	$3,466,000	$2,595,000
Cargo/Other SPV	CRANE BARGE MONARCH	CA	200	$2,481,700	1.75	$4,343,000	$1,076,000	$3,267,000	$2,482,000
Cargo/Other SPV	M/V BOWSTRING	FL	300	$1,606,500	1.75	$2,811,000	$1,076,000	$1,735,000	$1,606,000
Tank Barge (Single Hull)	T/B B NO. 120	MA	6,900	$58,572,600	1.75	$102,502,000	$29,591,000	$72,911,000	$1,753,000
Fishing Vessel	F/V CONNIE MARIE	CA	100	$647,300	1.75	$1,133,000	$1,076,000	$57,000	$5,000
TOTAL						**$117,231,000**	**$34,971,000**	**$82,260,000**	**$8,535,000**

Incident Year: 2004

Vessel Type	Project Name	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred
Fishing Vessel	F/V NEW HORIZON	CA	100	$805,300	1.70	$1,369,000	$1,076,000	$293,000	$305,000
Cargo/Other SPV	M/V SELENDANG AYU	AK	39,800	$132,583,300	1.70	$225,392,000	$51,682,000	$173,710,000	$102,384,000
Fishing Vessel	F/V MWALIL SAAT	GU	200	$3,413,500	1.70	$5,803,000	$1,076,000	$4,727,000	$3,414,000
Fishing Vessel	F/V THE BOSS	OR	200	$926,100	1.70	$1,574,000	$1,076,000	$498,000	$926,000
Tank Ship (Single Hull)	T/V ATHOS I	NJ	37,900	$252,502,100	1.70	$429,254,000	$151,580,000	$277,674,000	$210,557,000
Cargo/Other SPV	M/V ORIENTAL I	FL	200	$727,400	1.70	$1,237,000	$1,076,000	$161,000	$727,000
TOTAL						**$664,629,000**	**$207,566,000**	**$457,063,000**	**$318,313,000**

Incident Year: 2005

Tank Barge (Double Hull)	T/B DBL 152	LA	9,700	$51,556,200	1.65	$85,068,000	$24,353,000	$60,715,000	$24,621,000
Cargo/Other SPV	ALBION	CA	200	$1,207,100	1.65	$1,992,000	$1,076,000	$916,000	$1,207,000
Cargo/Other SPV	M/V CASITAS	HI	300	$1,710,700	1.65	$2,823,000	$1,076,000	$1,747,000	$1,711,000
Tank Barge (Single Hull)	T/B EMC 423	IL	1,400	$10,188,600	1.65	$16,811,000	$8,070,000	$8,741,000	$10,189,000
Fishing Vessel	F/V MILKY WAY	WA	200	$1,005,100	1.65	$1,658,000	$1,076,000	$582,000	$539,000
TOTAL						**$108,352,000**	**$35,651,000**	**$72,701,000**	**$38,267,000**

Incident Year: 2006

Cargo/Other SPV	MAMA LERE	TX	400	$1,217,300	1.59	$1,935,000	$1,076,000	$859,000	$1,217,000
TOTAL						**$1,935,000**	**$1,076,000**	**$859,000**	**$1,217,000**

Incident Year: 2007

Cargo/Other SPV	M/V COSCO BUSAN	CA	65,100	$102,000,000	1.55	$158,100,000	$84,670,000	$73,430,000	$4,208,000
Cargo/Other SPV	M/V SENECA	MI	200	$1,211,000	1.55	$1,877,000	$1,076,000	$801,000	$1,211,000
Cargo/Other SPV	LST-1166	OR	2,400	$5,151,000	1.55	$7,984,000	$3,143,000	$4,841,000	$5,151,000
Cargo/Other SPV	CATALA	WA	5,700	$6,138,500	1.55	$9,515,000	$7,410,000	$2,105,000	$6,138,000
TOTAL						**$177,476,000**	**$96,299,000**	**$81,177,000**	**$16,708,000**

Incident Year: 2008

Tank Barge (Double Hull)	T/B DM932	LA	800	$104,460,700	1.48	$154,602,000	$5,380,000	$149,222,000	$23,406,000
Cargo/Other SPV	C/V SEA WITCH	MD	17,900	$20,629,900	1.48	$30,532,000	$23,273,000	$7,260,000	$20,630,000
Cargo/Other SPV	BIG BOY & SCOOBY DOO	PA	200	$1,010,800	1.48	$1,496,000	$1,076,000	$420,000	$1,011,000
TOTAL						**$186,630,000**	**$29,729,000**	**$156,902,000**	**$45,047,000**

Incident Year: 2009

Vessel Type	Project Name	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred
Fishing Vessel	CAPT MIKE	LA	100	$2,413,400	1.50	$3,620,000	$1,076,000	$2,544,000	$2,413,000
Cargo/Other SPV	WENONAH	CA	300	$947,800	1.50	$1,422,000	$1,076,000	$346,000	$948,000
Cargo/Other SPV	SOUND DEVELOPER	AK	200	$1,657,100	1.50	$2,486,000	$1,076,000	$1,410,000	$1,657,000
Cargo/Other SPV	MONARCH	AK	300	$2,097,500	1.50	$3,146,000	$1,076,000	$2,070,000	$1,333,000
Fishing Vessel	F/V MAR-GUN	AK	200	$1,442,500	1.50	$2,164,000	$1,076,000	$1,088,000	$199,000
TOTAL						**$12,838,000**	**$5,380,000**	**$7,458,000**	**$6,550,000**

Incident Year: 2010

Cargo/Other SPV	M/V PRINCESS KATHLEEN	AK	5,900	$14,185,900	1.47	$20,853,000	$7,638,000	$13,216,000	$14,186,000
TOTAL						**$20,853,000**	**$7,638,000**	**$13,216,000**	**$14,186,000**

Incident Year: 2011

Cargo/Other SPV	DAVY CROCKETT	WA	4,600	$22,457,500	1.42	$31,890,000	$6,036,000	$25,854,000	$22,458,000
Cargo/Other SPV	TUG TIGER	CA	200	$4,205,500	1.42	$5,972,000	$1,076,000	$4,896,000	$4,205,000
TOTAL						**$37,862,000**	**$7,112,000**	**$30,750,000**	**$26,663,000**

Incident Year: 2012

Cargo/Other SPV	JIREH	PR	1,000	$16,514,100	1.40	$23,120,000	$1,273,000	$21,847,000	$16,518,000
Fishing Vessel	DEEP SEA	WA	200	$3,015,600	1.40	$4,222,000	$1,076,000	$3,146,000	$3,024,000
Tank Barge (Single Hull)	BOSTON 30	NY	1,600	$17,170,700	1.40	$24,039,000	$8,070,000	$15,969,000	$8,818,000
TOTAL						**$51,381,000**	**$10,419,000**	**$40,962,000**	**$28,360,000**

Incident Year: 2013

Fishing Vessel	F/V LONE STAR	AK	100	$3,398,400	1.38	$4,690,000	$1,076,000	$3,614,000	$3,398,000
Cargo/Other SPV	RESPECT	CA	200	$2,467,600	1.38	$3,405,000	$1,076,000	$2,329,000	$2,468,000
Cargo/Other SPV	STEPHEN L. COLBY	IA	200	$1,355,600	1.38	$1,871,000	$1,076,000	$795,000	$1,356,000
TOTAL						**$9,966,000**	**$3,228,000**	**$6,738,000**	**$7,222,000**

Incident Year: 2014

Tank Barge (Double Hull)	KIRBY 27706	TX	1,600	$104,700,200	1.35	$141,345,000	$5,380,000	$135,965,000	$5,090,000
Fishing Vessel	DAIKI MARU 7	GU	100	$1,550,000	1.35	$2,093,000	$1,076,000	$1,017,000	$63,000
TOTAL						**$143,438,000**	**$6,456,000**	**$136,982,000**	**$5,153,000**

Incident Year: 2015

Vessel Type	Project Name	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred
Cargo/Other SPV	M/V CHALLENGER	AK	100	$2,541,200	1.35	$3,431,000	$1,076,000	$2,355,000	$2,541,000
TOTAL						**$3,431,000**	**$1,076,000**	**$2,355,000**	**$2,541,000**

Incident Year: 2016

Cargo/Other SPV	SPIRIT OF SACRAMENTO	CA	100	$1,514,800	1.34	$2,030,000	$1,076,000	$954,000	$1,515,000
TOTAL						**$2,030,000**	**$1,076,000**	**$954,000**	**$1,515,000**

Incident Year: 2017

Cargo/Other SPV	TUG TUTAHACO	FL	200	$4,000,000	1.31	$5,240,000	$1,076,000	$4,164,000	$2,715,000
Cargo/Other SPV	M/V AKUTAN	AK	700	$968,000	1.31	$1,268,000	$1,076,000	$192,000	$968,000
Fishing Vessel	F/V PACIFIC PARADISE	HI	200	$2,500,000	1.31	$3,275,000	$1,076,000	$2,199,000	$1,657,000
Cargo/Other SPV	AKUTAN	AK	700	$949,800	1.31	$1,244,000	$1,076,000	$168,000	$950,000
Cargo/Other SPV	POWHATAN	AK	200	$7,072,700	1.31	$9,265,000	$1,076,000	$8,189,000	$3,032,000
Cargo/Other SPV	SS PETER STUYVESANT	MA	1,700	$2,400,000	1.31	$3,144,000	$2,237,000	$907,000	$109,000
Cargo/Other SPV	D-B VENGEANCE	CA	400	$1,929,700	1.31	$2,528,000	$1,076,000	$1,452,000	$127,000
TOTAL						**$25,964,000**	**$8,693,000**	**$17,271,000**	**$9,558,000**

Incident Year: 2018

Cargo/Other SPV	M/V OCEAN KING	MA	200	$1,436,600	1.28	$1,839,000	$1,076,000	$763,000	$1,046,000
Cargo/Other SPV	S-2006	MP	1,000	$8,554,000	1.28	$10,949,000	$1,244,000	$9,705,000	$8,554,000
Cargo/Other SPV	GRAND MARIANA I	MP	400	$3,310,700	1.28	$4,238,000	$1,076,000	$3,162,000	$1,461,000
Cargo/Other SPV	GATE CITY	WV	200	$1,857,000	1.28	$2,377,000	$1,076,000	$1,301,000	$1,857,000
Cargo/Other SPV	F/V PACIFIC KNIGHT	AK	200	$1,297,800	1.28	$1,661,000	$1,076,000	$585,000	$1,298,000
Cargo/Other SPV	YP 702	GA	200	$1,544,800	1.28	$1,977,000	$1,076,000	$901,000	$1,545,000
Cargo/Other SPV	L/B RAM XVIII	LA	800	$4,789,300	1.28	$6,130,000	$1,066,000	$5,064,000	$0
TOTAL						**$23,041,000**	**$3,396,000**	**$16,417,000**	**$15,761,000**

Incident Year: 2019

Cargo/Other SPV	GOLDEN RAY	GA	71,200	$175,000,000	1.26	$220,500,000	$92,531,000	$127,969,000	$7,481,000
TOTAL						**$220,500,000**	**$92,531,000**	**$127,969,000**	**$7,481,000**

Incident Year: 2020

Vessel Type	Project Name	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred
Cargo/Other SPV	F/V MIDWAY ISLAND	HI	200	$1,387,400	1.25	$1,734,000	$1,076,000	$658,000	$1,387,000
Fishing Vessel	PAPPYS PRIDE	TX	200	$969,000	1.25	$1,211,000	$1,076,000	$135,000	$969,000
TOTAL						**$2,945,000**	**$2,152,000**	**$793,000**	**$2,356,000**

Incident Year: 2021

Fishing Vessel	F/V AMERICAN CHALLENGER	CA	200	$13,780,800	1.19	$16,399,000	$1,076,000	$15,323,000	$13,781,000
Fishing Vessel	F/V ST PATRICK	AK	200	$4,655,800	1.19	$5,540,000	$1,076,000	$4,464,000	$4,656,000
TOTAL						**$21,939,000**	**$2,152,000**	**$19,787,000**	**$18,437,000**

Incident Year: 2022

Cargo/Other SPV	WESTERN MARINER	AK	100	$2,149,600	1.10	$2,365,000	$1,076,000	$1,289,000	$565,000
Fishing Vessel	ALEUTIAN ISLE	WA	200	$6,294,500	1.10	$6,924,000	$1,076,000	$5,848,000	$6,295,000
Cargo/Other SPV	M/V ALERT	OR	200	$1,486,900	1.10	$1,636,000	$1,076,000	$560,000	$1,487,000
TOTAL						**$10,925,000**	**$3,228,000**	**$7,697,000**	**$8,347,000**

Incident Year: 2023

Cargo/Other SPV	TUG MAZAPETA	CA	200	$3,092,500	1.06	$3,278,000	$1,076,000	$2,202,000	$3,093,000
TOTAL						**$3,278,000**	**$1,076,000**	**$2,202,000**	**$3,093,000**

Incident Year: 2024

Cargo/Other SPV	OBSESSION	PR	200	$3,040,500	1.02	$3,101,000	$1,076,000	$2,025,000	$2,985,000
TOTAL						**$3,101,000**	**$1,076,000**	**$2,025,000**	**$2,985,000**

Total 1990-2005						**$1,945,806,000**	**$632,330,000**	**$1,313,476,000**	**$652,906,000**
Total 2006-2025						**$965,662,000**	**$288,088,000**	**$677,574,000**	**$223,178,000**

GRAND TOTAL						**$2,911,468,000**	**$920,418,000**	**$1,991,050,000**	**$876,084,000**

Appendix D: Incidents Exceeding Liability Limits with Limits to Achieve 50 Percent Cost Share

Vessel Type: Tank Ship (Single Hull)

Vessel Name	Incident Year	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred	Liability Limits for a 50% RP Share	Minimum Liability for a 50% RP Share	Gross Ton Liability Limits for a 25% RP Share	Minimum Liability for a 25% RP Share	Gross Ton Liability Limits for a 75% RP Share	Minimum Liability for a 75% RP Share
										Shaded Area Indicates Higher Limit Which Would Be Applied		Shaded Area Indicates Higher Limit Which Would Be		Shaded Area Indicates Higher Limit Which Would Be Applied	
T/V JULIE N	1996	ME	18,500	$52,601,200	2.05	$107,832,000	$73,908,000	$33,924,000	$28,376,000	$88,130,000	$134,300,000	$44,065,000	$67,100,000	$132,194,000	$201,400,000
T/V ATHOS I	2004	NJ	37,900	$252,502,100	1.70	$429,254,000	$151,580,000	$277,674,000	$210,557,000	$180,547,000	$134,300,000	$90,273,000	$67,100,000	$270,820,000	$201,400,000
Total						**$537,086,000**	**$225,488,000**	**$311,598,000**	**$238,933,000**						

Vessel Type: Tank Barge (Single

T/B VISTABELLA	1991	PR	1,100	$5,613,700	2.37	$13,305,000	$8,070,000	$5,234,000	$4,782,000	$10,975,000	$40,700,000	$5,487,000	$20,400,000	$16,462,000	$61,100,000
T/B (TAMPA BAY COLLISION)	1993	FL	9,300	$68,900,000	2.23	$153,647,000	$37,048,000	$116,599,000	$2,397,000	$92,786,000	$40,700,000	$46,393,000	$20,400,000	$139,180,000	$61,100,000
T/B MORRIS J. BERMAN	1994	PR	5,400	$95,488,300	2.18	$208,164,000	$29,591,000	$178,573,000	$95,488,000	$53,876,000	$40,700,000	$26,938,000	$20,400,000	$80,814,000	$61,100,000
M/V SCANDIA & T/B NORTH CAPE	1996	RI	5,500	$49,000,000	2.05	$100,450,000	$29,591,000	$70,859,000	$9,046,000	$54,874,000	$40,700,000	$27,437,000	$20,400,000	$82,310,000	$61,100,000
T/B BUFFALO #292	1996	TX	1,500	$15,776,900	2.05	$32,343,000	$8,070,000	$24,272,000	$16,810,000	$14,966,000	$40,700,000	$7,483,000	$20,400,000	$22,448,000	$61,100,000
T/B B NO. 120	2003	MA	6,900	$58,572,600	1.75	$102,502,000	$29,591,000	$72,911,000	$1,753,000	$68,842,000	$40,700,000	$34,421,000	$20,400,000	$103,262,000	$61,100,000
T/B EMC 423	2005	IL	1,400	$10,188,600	1.65	$16,811,000	$8,070,000	$8,741,000	$10,189,000	$13,968,000	$40,700,000	$6,984,000	$20,400,000	$20,952,000	$61,100,000
BOSTON 30	2012	NY	1,600	$17,170,700	1.40	$24,039,000	$8,070,000	$15,969,000	$8,818,000	$15,963,000	$40,700,000	$7,982,000	$20,400,000	$23,945,000	$61,100,000
Total						**$651,261,000**	**$158,104,000**	**$493,157,000**	**$149,283,000**						

Vessel Type: Tank Barge (Double

T/B DBL 152	2005	LA	9,700	$51,556,200	1.65	$85,068,000	$24,353,000	$60,715,000	$24,621,000	$151,830,000	$63,500,000	$75,915,000	$31,800,000	$227,745,000	$95,300,000
T/B DM932	2008	LA	800	$104,460,700	1.48	$154,602,000	$5,380,000	$149,222,000	$23,406,000	$12,522,000	$63,500,000	$6,261,000	$31,800,000	$18,783,000	$95,300,000
KIRBY 27706	2014	TX	1,600	$104,700,200	1.35	$141,345,000	$5,380,000	$135,965,000	$5,090,000	$25,044,000	$63,500,000	$12,522,000	$31,800,000	$37,566,000	$95,300,000
Total						**$381,015,000**	**$35,113,000**	**$345,902,000**	**$53,117,000**						

SPV>300 GT

F/V TENYO MARU	1991	WA	4,200	$6,062,900	2.37	$14,369,000	$5,417,000	$8,952,000	$6,063,000	$7,265,000	$20,800,000	$3,633,000	$10,400,000	$10,898,000	$31,200,000
F/V JIN SHIANG FA	1993	AS	400	$2,013,000	2.23	$4,489,000	$1,076,000	$3,413,000	$2,420,000	$692,000	$20,800,000	$346,000	$10,400,000	$1,038,000	$31,200,000
M/V CITRUS	1996	AK	3,500	$7,739,900	2.05	$15,867,000	$4,541,000	$11,326,000	$433,000	$6,054,000	$20,800,000	$3,027,000	$10,400,000	$9,082,000	$31,200,000
M/V KUROSHIMA	1997	AK	4,200	$19,702,600	2.01	$39,602,000	$5,408,000	$34,194,000	$17,540,000	$7,265,000	$20,800,000	$3,633,000	$10,400,000	$10,898,000	$31,200,000
M/V KURE	1997	CA	36,000	$47,218,900	2.01	$94,910,000	$46,812,000	$48,098,000	$711,000	$62,273,000	$20,800,000	$31,137,000	$10,400,000	$93,410,000	$31,200,000
M/V NEW CARISSA	1999	OR	36,600	$50,501,400	1.93	$97,468,000	$47,542,000	$49,925,000	$26,775,000	$63,311,000	$20,800,000	$31,656,000	$10,400,000	$94,967,000	$31,200,000
M/V STUYVESANT	1999	CA	7,100	$11,700,000	1.93	$22,581,000	$9,244,000	$13,337,000	$379,000	$12,282,000	$20,800,000	$6,141,000	$10,400,000	$18,422,000	$31,200,000
M/V SERGO ZAKARIADZE	1999	PR	16,500	$15,966,700	1.93	$30,816,000	$21,453,000	$9,363,000	$6,065,000	$28,542,000	$20,800,000	$14,271,000	$10,400,000	$42,813,000	$31,200,000
SS J LUCKENBACH	2001	CA	7,900	$42,487,000	1.81	$76,901,000	$10,230,000	$66,672,000	$47,815,000	$13,666,000	$20,800,000	$6,833,000	$10,400,000	$20,498,000	$31,200,000
F/V WINDY BAY	2001	AK	400	$3,396,400	1.81	$6,147,000	$1,076,000	$5,071,000	$3,396,000	$692,000	$20,800,000	$346,000	$10,400,000	$1,038,000	$31,200,000
M/V BOWSTRING	2003	FL	300	$1,606,500	1.75	$2,811,000	$1,076,000	$1,735,000	$1,606,000	$519,000	$20,800,000	$259,000	$10,400,000	$778,000	$31,200,000
M/V SELENDANG AYU	2004	AK	39,800	$132,583,300	1.70	$225,392,000	$51,682,000	$173,710,000	$102,384,000	$68,846,000	$20,800,000	$34,423,000	$10,400,000	$103,270,000	$31,200,000
MAMA LERE	2006	TX	400	$1,217,300	1.59	$1,935,000	$1,076,000	$859,000	$1,217,000	$692,000	$20,800,000	$346,000	$10,400,000	$1,038,000	$31,200,000
M/V COSCO BUSAN	2007	CA	65,100	$102,000,000	1.55	$158,100,000	$84,670,000	$73,430,000	$4,208,000	$112,611,000	$20,800,000	$56,305,000	$10,400,000	$168,916,000	$31,200,000
LST-1166	2007	OR	2,400	$5,151,000	1.55	$7,984,000	$3,143,000	$4,841,000	$5,151,000	$4,152,000	$20,800,000	$2,076,000	$10,400,000	$6,227,000	$31,200,000
CATALA	2007	WA	5,700	$6,138,500	1.55	$9,515,000	$7,410,000	$2,105,000	$6,138,000	$9,860,000	$20,800,000	$4,930,000	$10,400,000	$14,790,000	$31,200,000

SPV>300 GT

Vessel Name	Incident Year	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred	Liability Limits for a 50% RP Share	Minimum Liability for a 50% RP Share	Gross Ton Liability Limits for a 25% RP Share	Minimum Liability for a 25% RP Share	Gross Ton Liability Limits for a 75% RP Share	Minimum Liability for a 75% RP Share
										Shaded Area Indicates Higher Limit Which Would Be Applied		Shaded Area Indicates Higher Limit Which Would Be		Shaded Area Indicates Higher Limit Which Would Be Applied	
C/V SEA WITCH	2008	MD	17,900	$20,629,900	1.48	$30,532,000	$23,273,000	$7,260,000	$20,630,000	$30,964,000	$20,800,000	$15,482,000	$10,400,000	$46,445,000	$31,200,000
M/V PRINCESS KATHLEEN	2010	AK	5,900	$14,185,900	1.47	$20,853,000	$7,638,000	$13,216,000	$14,186,000	$10,206,000	$20,800,000	$5,103,000	$10,400,000	$15,309,000	$31,200,000
DAVY CROCKETT	2011	WA	4,600	$22,457,500	1.42	$31,890,000	$6,036,000	$25,854,000	$22,458,000	$7,957,000	$20,800,000	$3,979,000	$10,400,000	$11,936,000	$31,200,000
JIREH	2012	PR	1,000	$16,514,100	1.40	$23,120,000	$1,273,000	$21,847,000	$16,518,000	$1,730,000	$20,800,000	$865,000	$10,400,000	$2,595,000	$31,200,000
M/V AKUTAN	2017	AK	700	$968,000	1.31	$1,268,000	$1,076,000	$192,000	$968,000	$1,211,000	$20,800,000	$605,000	$10,400,000	$1,816,000	$31,200,000
AKUTAN	2017	AK	700	$949,800	1.31	$1,244,000	$1,076,000	$168,000	$950,000	$1,211,000	$20,800,000	$605,000	$10,400,000	$1,816,000	$31,200,000
SS PETER STUYVESANT	2017	MA	1,700	$2,400,000	1.31	$3,144,000	$2,237,000	$907,000	$109,000	$2,941,000	$20,800,000	$1,470,000	$10,400,000	$4,411,000	$31,200,000
D-B VENGEANCE	2017	CA	400	$1,929,700	1.31	$2,528,000	$1,076,000	$1,452,000	$127,000	$692,000	$20,800,000	$346,000	$10,400,000	$1,038,000	$31,200,000
S-2006	2018	MP	1,000	$8,554,000	1.28	$10,949,000	$1,244,000	$9,705,000	$8,554,000	$1,730,000	$20,800,000	$865,000	$10,400,000	$2,595,000	$31,200,000
GRAND MARIANA I	2018	MP	400	$3,310,700	1.28	$4,238,000	$1,076,000	$3,162,000	$1,461,000	$692,000	$20,800,000	$346,000	$10,400,000	$1,038,000	$31,200,000
L/B RAM XVIII	2018	LA	800	$4,789,300	1.28	$6,130,000	$1,066,000	$5,064,000	$0	$1,384,000	$20,800,000	$692,000	$10,400,000	$2,076,000	$31,200,000
GOLDEN RAY	2019	GA	71,200	$175,000,000	1.26	$220,500,000	$92,531,000	$127,969,000	$7,481,000	$123,163,000	$20,800,000	$61,581,000	$10,400,000	$184,744,000	$31,200,000
Total						**$1,165,284,000**	**$441,457,000**	**$723,826,000**	**$325,743,000**						

SPV < or = 300 GT

F/V YU TE NO. 1	1999	AS	200	$1,164,600	1.93	$2,248,000	$1,076,000	$1,172,000	$5,296,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V AMIGA NO. 5	1999	AS	200	$3,355,700	1.93	$6,477,000	$1,076,000	$5,401,000	$2,766,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V KWANG MYONG	1999	AS	200	$1,554,800	1.93	$3,001,000	$1,076,000	$1,925,000	$965,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V KORAM NO. 3	1999	AS	200	$1,403,100	1.93	$2,708,000	$1,076,000	$1,632,000	$813,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V KWANG MYONG NO 72	1999	AS	200	$2,182,900	1.93	$4,213,000	$1,076,000	$3,137,000	$1,593,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V KWANG MYONG NO 58	1999	AS	200	$1,557,600	1.93	$3,006,000	$1,076,000	$1,930,000	$967,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V KORAM NO 1	1999	AS	200	$1,378,400	1.93	$2,660,000	$1,076,000	$1,584,000	$788,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V KWANG MYONG NO 51	1999	AS	200	$1,249,200	1.93	$2,411,000	$1,076,000	$1,335,000	$659,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V JESSICA ANN	2000	ME	200	$947,000	1.87	$1,771,000	$1,076,000	$695,000	$947,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V SWORDMAN I	2000	HI	100	$1,528,600	1.87	$2,859,000	$1,076,000	$1,783,000	$1,529,000	$870,000	$1,600,000	$435,000	$800,000	$1,305,000	$2,400,000
M/V KIMTON	2001	PR	200	$713,700	1.81	$1,292,000	$1,076,000	$216,000	$714,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V VANGUARD	2001	AK	200	$699,800	1.81	$1,267,000	$1,076,000	$191,000	$700,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V GENEI MARU #7	2002	AK	100	$869,800	1.79	$1,557,000	$1,076,000	$481,000	$870,000	$870,000	$1,600,000	$435,000	$800,000	$1,305,000	$2,400,000
F/V TERESA LYNN	2002	FL	200	$690,800	1.79	$1,237,000	$1,076,000	$161,000	$691,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V CONNIE MARIE	2003	CA	100	$647,300	1.75	$1,133,000	$1,076,000	$57,000	$5,000	$870,000	$1,600,000	$435,000	$800,000	$1,305,000	$2,400,000
VICTORIA ROSE HUNT	2003	MA	100	$1,085,700	1.75	$1,900,000	$1,076,000	$824,000	$94,000	$870,000	$1,600,000	$435,000	$800,000	$1,305,000	$2,400,000
M/V RED DIAMOND	2003	FL	200	$2,595,200	1.75	$4,542,000	$1,076,000	$3,466,000	$2,595,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
CRANE BARGE MONARCH	2003	CA	200	$2,481,700	1.75	$4,343,000	$1,076,000	$3,267,000	$2,482,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V NEW HORIZON	2004	CA	100	$805,300	1.70	$1,369,000	$1,076,000	$293,000	$305,000	$870,000	$1,600,000	$435,000	$800,000	$1,305,000	$2,400,000
F/V MWALIL SAAT	2004	GU	200	$3,413,500	1.70	$5,803,000	$1,076,000	$4,727,000	$3,414,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V THE BOSS	2004	OR	200	$926,100	1.70	$1,574,000	$1,076,000	$498,000	$926,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
M/V ORIENTAL I	2004	FL	200	$727,400	1.70	$1,237,000	$1,076,000	$161,000	$727,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V MILKY WAY	2005	WA	200	$1,005,100	1.65	$1,658,000	$1,076,000	$582,000	$539,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
ALBION	2005	CA	200	$1,207,100	1.65	$1,992,000	$1,076,000	$916,000	$1,207,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000

SPV < or = 300 GT

Vessel Name	Incident Year	Incident Location	Gross Tonnage	Total Incident Cost	Inflation Factor	Total Incident Cost (2025 Dollars)	Limits of Liability	Fund Exposure	Actual Fund Costs Incurred	Liability Limits for a 50% RP Share	Minimum Liability for a 50% RP Share	Gross Ton Liability Limits for a 25% RP Share	Minimum Liability for a 25% RP Share	Gross Ton Liability Limits for a 75% RP Share	Minimum Liability for a 75% RP Share
										Shaded Area Indicates Higher Limit Which Would Be Applied		Shaded Area Indicates Higher Limit Which Would Be		Shaded Area Indicates Higher Limit Which Would Be Applied	
M/V CASITAS	2005	HI	300	$1,710,700	1.65	$2,823,000	$1,076,000	$1,747,000	$1,711,000	$2,609,000	$1,600,000	$1,305,000	$800,000	$3,914,000	$2,400,000
M/V SENECA	2007	MI	200	$1,211,000	1.55	$1,877,000	$1,076,000	$801,000	$1,211,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
BIG BOY & SCOOBY DOO	2008	PA	200	$1,010,800	1.48	$1,496,000	$1,076,000	$420,000	$1,011,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
CAPT MIKE	2009	LA	100	$2,413,400	1.50	$3,620,000	$1,076,000	$2,544,000	$2,413,000	$870,000	$1,600,000	$435,000	$800,000	$1,305,000	$2,400,000
F/V MAR-GUN	2009	AK	200	$1,442,500	1.50	$2,164,000	$1,076,000	$1,088,000	$199,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
WENONAH	2009	CA	300	$947,800	1.50	$1,422,000	$1,076,000	$346,000	$948,000	$2,609,000	$1,600,000	$1,305,000	$800,000	$3,914,000	$2,400,000
SOUND DEVELOPER	2009	AK	200	$1,657,100	1.50	$2,486,000	$1,076,000	$1,410,000	$1,657,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
MONARCH	2009	AK	300	$2,097,500	1.50	$3,146,000	$1,076,000	$2,070,000	$1,333,000	$2,609,000	$1,600,000	$1,305,000	$800,000	$3,914,000	$2,400,000
TUG TIGER	2011	CA	200	$4,205,500	1.42	$5,972,000	$1,076,000	$4,896,000	$4,205,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
DEEP SEA	2012	WA	200	$3,015,600	1.40	$4,222,000	$1,076,000	$3,146,000	$3,024,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V LONE STAR	2013	AK	100	$3,398,400	1.38	$4,690,000	$1,076,000	$3,614,000	$3,398,000	$870,000	$1,600,000	$435,000	$800,000	$1,305,000	$2,400,000
RESPECT	2013	CA	200	$2,467,600	1.38	$3,405,000	$1,076,000	$2,329,000	$2,468,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
STEPHEN L. COLBY	2013	IA	200	$1,355,600	1.38	$1,871,000	$1,076,000	$795,000	$1,356,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
DAIKI MARU 7	2014	GU	100	$1,550,000	1.35	$2,093,000	$1,076,000	$1,017,000	$63,000	$870,000	$1,600,000	$435,000	$800,000	$1,305,000	$2,400,000
M/V CHALLENGER	2015	AK	100	$2,541,200	1.35	$3,431,000	$1,076,000	$2,355,000	$2,541,000	$870,000	$1,600,000	$435,000	$800,000	$1,305,000	$2,400,000
SPIRIT OF SACRAMENTO	2016	CA	100	$1,514,800	1.34	$2,030,000	$1,076,000	$954,000	$1,515,000	$870,000	$1,600,000	$435,000	$800,000	$1,305,000	$2,400,000
F/V PACIFIC PARADISE	2017	HI	200	$2,500,000	1.31	$3,275,000	$1,076,000	$2,199,000	$1,657,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
TUG TUTAHACO	2017	FL	200	$4,000,000	1.31	$5,240,000	$1,076,000	$4,164,000	$2,715,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
POWHATAN	2017	AK	200	$7,072,700	1.31	$9,265,000	$1,076,000	$8,189,000	$3,032,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
M/V OCEAN KING	2018	MA	200	$1,436,600	1.28	$1,839,000	$1,076,000	$763,000	$1,046,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
GATE CITY	2018	WV	200	$1,857,000	1.28	$2,377,000	$1,076,000	$1,301,000	$1,857,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V PACIFIC KNIGHT	2018	AK	200	$1,297,800	1.28	$1,661,000	$1,076,000	$585,000	$1,298,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
YP 702	2018	GA	200	$1,544,800	1.28	$1,977,000	$1,076,000	$901,000	$1,545,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
PAPPYS PRIDE	2020	TX	200	$969,000	1.25	$1,211,000	$1,076,000	$135,000	$969,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V MIDWAY ISLAND	2020	HI	200	$1,387,400	1.25	$1,734,000	$1,076,000	$658,000	$1,387,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V AMERICAN CHALLENGER	2021	CA	200	$13,780,800	1.19	$16,399,000	$1,076,000	$15,323,000	$13,781,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
F/V ST PATRICK	2021	AK	200	$4,655,800	1.19	$5,540,000	$1,076,000	$4,464,000	$4,656,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
ALEUTIAN ISLE	2022	WA	200	$6,294,500	1.10	$6,924,000	$1,076,000	$5,848,000	$6,295,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
WESTERN MARINER	2022	AK	100	$2,149,600	1.10	$2,365,000	$1,076,000	$1,289,000	$565,000	$870,000	$1,600,000	$435,000	$800,000	$1,305,000	$2,400,000
M/V ALERT	2022	OR	200	$1,486,900	1.10	$1,636,000	$1,076,000	$560,000	$1,487,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
TUG MAZAPETA	2023	CA	200	$3,092,500	1.06	$3,278,000	$1,076,000	$2,202,000	$3,093,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
OBSESSION	2024	PR	200	$3,040,500	1.02	$3,101,000	$1,076,000	$2,025,000	$2,985,000	$1,740,000	$1,600,000	$870,000	$800,000	$2,609,000	$2,400,000
Total						**$176,823,000**	**$60,256,000**	**$116,567,000**	**$109,008,000**						
Grand Total						**$2,911,468,000**	**$920,418,000**	**$1,991,050,000**	**$876,084,000**						