



"The mission of the Council is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet."

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October 27, 2017

Mike Evans
Industry Preparedness Program
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

SUBJECT: Comments on RFAI response regarding Harvest Alaska, LLC, Oil Discharge Prevention and Contingency Plan for Cook Inlet Facilities (Plan No. 17-CP-2081);

Dear Mr. Evans:

Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits these comments on Harvest Alaska, LLC's submittal dated September 25, 2017, which was revised in response to the Alaska Department of Environmental Conservation's requests for additional information (RFAI). CIRCAC's mission is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and crude oil facility operations in Cook Inlet.

We appreciate that Harvest has addressed most of the issues raised in the first RFAI. This letter provides comments only on the items that have been modified per ADEC's instruction in the September 27, 2017 letter announcing the opening of a 10-day comment period.

1. Muster and evacuation details are provided for DRT, however no detail is provided for WFPS, please include. (Item# 15). Harvest updated evacuation details in Section 1.3.5 and in Appendix A but in the case of Figure A-4 (Christy Lee Platform), while it does show the location of the escape pod (evac craft), there is still no depiction of muster areas or evacuation routes as required by 18 AAC 75.425(e)(1)(c). We recommend updating this figure to include this information and increasing the size of the figure to make it easier to read.

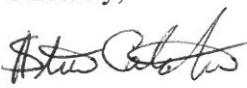
2. Procedures to stop the discharge (Item #26). While the new language in 1.6.1 indicates that "specific procedures for stopping a discharge at each source can be found in the following sections," specific procedural detail is still lacking. The first example where more detail could be included is the first bullet in 1.6.1. While isolating segments of a spilling line or tank by closing valves is certainly an important step, actually securing pumps is a detail that when left out could casue a bigger issue. Another example, under Section 2.1.6, where closure of remote valves (which requires helicopter travel to each site) is the source control method, the "specific procedures for stopping a discharge" consist of nothing more than a paragraph that indicates that the "controller can stop the flow of incoming oil within 1 hour after detection of a spill using the control panel located in the control room," and further that, "if a spill is detected, block valves, remotely operated motor-operated valves (MOVs), and check valves can be closed to isolate a pipeline segment, minimizing the spill volume." This information provides the "who" and the "what", but lacks sufficient detail on the "how." We suggest adding more detail on how these specific procedures will be carried out.

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3. Personnel at Harvest facilities (Item #91). The plan was revised to clarify that there is a minimum of 4 personnel at the Drift River Terminal at all times and that Hilcorp personnel "support" some Harvest facilities. Use of the term "support" is vague within the context of this section (2.1.1). It is unclear what "support" entails. There is no indication of how many Hilcorp personnel are on-site. It is unclear if they are offsite but perform regular visits/inspections. We suggest adding language that further clarifies staffing and manning (both Harvest and Hilcorp personnel) at each facility.

Thank you for considering these additional comments. As always, if you have any questions or wish to discuss this further, I can be reached at (907) 283-7222 or via email at MikeMunger@circac.org. CIRCAC requests a findings document to be supplied at the end of this plan review.

Sincerely,

p.p. 

Michael Munger
Executive Director

Cc: Graham Wood