



*"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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of Anchorage*

July 3, 2019

Kristin Worman  
Environmental Program Specialist  
Spill Prevention, Preparedness and Response Program  
Alaska Department of Environmental Conservation  
*via email:* Kristin.Worman@alaska.gov

**SUBJECT:** Comments on RFAI response regarding Andeavor, LLC, Cook Inlet Vessel Oil Discharge Prevention and Contingency Plan Renewal

Dear Ms. Worman:

Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits the enclosed comments on Andeavor, LLC's (Andeavor) proposed renewal to their Oil Discharge Prevention and Contingency Plan. 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.

Overall, we appreciate that the plan holder has made a number of improvements over time based on input from CIRCAC and others. We also appreciate that the CISPRI Technical Manual has been made available by that organization.

If you have any questions, please do not hesitate to contact me at [SteveCatalano@circac.org](mailto:SteveCatalano@circac.org) or (907) 283-7222.

Sincerely,

Steve "Vinnie" Catalano  
Director of Operations



**Comments and Requests for Additional Information**

**Regarding**

**Andeavor, LLC**

**Cook Inlet Vessel Operations**

**Oil Discharge Prevention and Contingency Plan**

**(14-CP-2039)**

**Submitted**

**By**

**COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL**

**JULY 3, 2019**

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## General Comments

The Andeavor, LLC Vessel Cook Inlet Area Operations Oil Discharge Prevention and Contingency Plan (ODPCP or C-plan) is well-written and thorough. As this contingency plan review was performed for a plan renewal, all sections of the plan were reviewed. We note with appreciation the changes made in past plan reviews in response to comments from CIRCAC and other reviewers.

### OBJECTIVES

The plan identifies Drift River as a possible port of call at least in this section and Section 2.1 *Prevention Programs in Place* and Section 3.1 *Vessel Description and Operational Overview*.

*RFAI: Please revise the content to accurately reflect the operational status of the Drift River terminal.*

## 1.0 Response Action Plans

### 1.2 Reporting and Notification

Section 1.2 begins with the statement, "The vessel master is responsible for reporting vessel oil discharges to state waters to the required government agencies." As correctly noted in Table 1.2-2 Agency Reporting Requirements for Oil Spills, notification is required for *any* spill to navigable waters or shoreline (regardless of whether state or federal).

*RFAI: Please revise Section 1.2 to add clarity for spill notification and to avoid confusion.*

#### 1.2.2 External Notification Procedures

This section identifies the external notifications that would be made in the event of a spill, as required at 18 AAC 75.425(e)(1)(B)(ii). We suggest updating the contact information as follows:

- The USCG MSD in Kodiak number should be corrected to: 907-486-8918.
- Include the ADEC 24-hour reporting phone number (800-478-9300) and specify the instructions to call the nearest response team office (Anchorage) during normal business hours (per ADEC website).
- Consider adding Alaska Chadux to the list of OSROs here (they are listed on page 3-21 as one of the OSROs which may provide equipment to CISPRI in the event of a major spill).

*RFAI: Please update contact information in plan as listed above.*

### 1.6 Response Strategies

**Response Equipment Mobilization Charts - General:** While this may be an issue with PDF conversion, many of these tables were difficult to read. If this is the case in the original document, recommend rescanning. Readability issues were also called out in the 2014 Tesoro plan review.

*RFAI: Please ensure tables and figures are legible.*

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### 1.6.1 Response Scenario #1 – 210,000 bbl Scenario

This scenario is intended to demonstrate the ability of the plan holder to meet the required response planning standard. It technically does so in terms of the volume of oil spilled and oil recovered based on the assumptions described. However, we again assert that, this scenario is a poor indication of how a response could proceed for most of the Inlet south of Nikiski since this hypothetical scenario takes place beginning first thing in the morning with very favorable conditions next to the dock, along with convenient and significant storage capacity immediately on hand.

*RFAI: In the spirit of the intent of the response planning standard regulations, we suggest that a more challenging scenario would more appropriately demonstrate the plan holders' ability to meet the logistical and practical challenges of a significant spill response away from the immediate dock area.*

On page 1-30, the section on Spill Source Control indicates that the vessel master, should confirm that "the inert gas system is in operation" as part of his/her "immediate procedures," yet this step is not included in the Vessel Master Checklist in Section 1.1.

*RFAI: Please add to the Vessel Master Checklist the procedure for confirming that the inert gas system is in operation.*

Table 1.6-14 Scenario 1 Oil Recovery Table includes a note (3) that states that nearshore assets and recovery are *not* included, but there are nearshore recovery systems in the table.

*RFAI: Please clarify whether the oil recovery estimates include nearshore systems.*

## 3.0 Supplemental Information

### 3.7 Non-mechanical Response Information

This section states that "Non-mechanical response effectiveness, detailed response plans, assessment of environmental consequences, environmental monitoring and permit requirements...are provided in the referenced CISPRI Technical Manual sections." Regulations at 18 AAC 75.445(h) require that C-plans include "provisions for continuous monitoring and real-time assessment of environmental effects." This is not included in the referenced CISPRI Technical Manual section.

*RFAI: Please describe the personnel, resources, and methods that will be used to monitor for environmental effects during dispersant use or in-situ burning.*

### 3.11 Bibliography

While we noted references in the text to the Arctic and Western Alaska Area Contingency Plan (ACP), the bibliography refers still to the Cook Inlet Sub-area plan. Updated bibliographical references are a convenient way to show the plan holder's effort to use the most up-to-date resources.

*RFAI: Please update referenced documents in the bibliography to include both the Arctic and Western Alaska ACP and the Alaska Regional Contingency Plan.*

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We also suggest that the Cook Inlet Response Tool should be included in the C-plan as a valuable reference for any spills occurring on, or near, Cook Inlet. The tool can be found at: <http://portal.aos.org/cirt.php>.

*RFAI: Please add a reference to the Cook Inlet Response Tool in Section 3.11 and Section 1.6.5 Protection of Sensitive Areas.*