



“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.”

22 April 2015

Members

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Chamber of
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Borough*

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Borough*

*Municipality of
Anchorage*

EPA Docket Center (EPA/DC)
Docket ID No. EPA-HQ-OPA-2006-0090
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Cook Inlet Regional Citizens Advisory Council (CIRCAC) Comments on 40 CFR Parts 110 and 300: National Oil and Hazardous Substances Contingency Plan Proposed Rule

Dear Administrator McCarthy:

The Cook Inlet Regional Citizens Advisory Council (CIRCAC) is a citizen's oversight council for the crude oil industry operations in the Cook Inlet region, and was established according to Section 5002 of the Oil Pollution Act of 1990 (OPA 90). Through this act, CIRCAC represents 13 communities and stakeholder groups in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet.

With a body of work amassed over 25 years, CIRCAC is a recognized leader in conducting environmental monitoring, contaminant and habitat assessments, and oceanographic studies. We are engaged in oil spill prevention and response activities at nearly every level. As a named reviewer of Cook Inlet area contingency plans under state regulation and a participant on the Cook Inlet Sub-Area Committee, we play a key role in shaping spill response and contingency plans. Our input is solicited at Incident Command during oil spills and drills where we are active participants, and we often provide data from our studies that are key to evaluating potential impacts of response decisions on habitats and on receptor species. In addition, we contribute to the development and review of national initiatives for dispersants research through our involvement with the Coastal Response and Research Center (CRRC) Dispersants Workgroup.

In the context of this experience, we provide the following comments on the proposed rulemaking. We appreciate EPA's intent to update the rule and believe that overall the proposed revisions will strengthen Subpart J by promoting a science-based approach to the use of chemical and biological agents.

We appreciate the opportunity to provide these comments.

Sincerely,

Michael L. Munger
Executive Director