"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."

Members

Tourism Organizations

Alaska Native Groups

Environmental Groups

Recreational Groups

Aquaculture Associations

Commercial Fishing Organizations

City of Kodiak

City of Kenai

City of Seldovia

City of Homer

Kodiak Island Borough

Kenai Peninsula Borough

Municipality of Anchorage

March 8, 2018

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 Harvest Alaska Facilities

Dear Mr. Evans:

Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits these comments on Harvest Alaska, LLC's proposed amendments to their Oil Discharge Prevention and Contingency Plan as approved in 2017. The mission of the Cook Inlet RCAC is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and crude oil facility operations in Cook Inlet.

The purpose of the amendment is to incorporate a conversion of exisiting, unused pipelines to create a Cross-Inlet pipeline system in Cook Inlet. CIRCAC has long advocated for the use of a subsea pipeline to transport crude oil from the west side of Cook Inlet to the refinery in Nikiski. Such infrastructure would eliminate the loading and shipment of oil by tanker across Cook Inlet, and the need to store oil at the Drift River Terminal. The Cook Inlet Risk Assessment concluded in 2013 that this change would result in a reduction of oil spill risk for Cook Inlet considering the elimination of the tanker traffic alone. Eliminating the storage of oil in the volcanically active Drift River area provides further risk reduction gains. Additionally, we appreciate that the plan amendment specifies use of the Atmos Pipe leak detection system and recognizes the importance of anticipating subsea hazards.

While we strongly support the Cross-Inlet pipeline effort, we are discouraged that the Drift River Terminal and associated infrastructure remain in this plan. We encourage ADEC to seek clarification from the operator regarding their intent to in fact cease use of that facility and the timeline on which this would likely occur.

Our enclosed comments also identify some areas for improvement and clarification to the amended plan sections. 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

Comments and Requests for Additional Information

Regarding

Harvest Alaska, LLC

Cook Inlet Facilities

Oil Discharge Prevention and Contingency Plan Revision 1 (Cross-Inlet Pipeline Amendment)

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

MARCH 8, 2018

Overview

Introduction

1.0 Response Action Plan

1.6 Response Actions and Strategy

Table 1-12, p. 1-48 (vi)

In the scenario revised for Chakachatna River, it is unclear why the language specifying the use of CISPRI Class 6 vessels for boom deployment is changed to refer simply to "contract" vessels. Please clarify that these will in fact be CISPRI vessels or, if not, who will provide them, and how adequate capabilities will be ascertained and ensured.

New Scenario for Subsea Pipeline Rupture at Kaloa Junction

Oil will be moving across Cook Inlet, but the scenario assumes a spill close to shore on the west side of the Inlet. To demonstrate adequate planning for a spill response, this scenario should instead assume a spill from a rupture in the deepest part of the Inlet where the currents are strongest and the oil would be most affected or in an area known to have issues with pipeline impacts by rocks and boulders or scouring problems that cause span issues.

Related to this, the trajectory used (Figure 1-6, Pipeline Rupture Scenario at Subsea Pipeline, page 1-77) depicts the potential trajectory for the subsea pipeline rupture, showing oil moving straight north to affect a short portion of the coastline near the spill. While we appreciate that the trajectory is based on GNOME, for planning purposes it is more realistic to assume that in the short term the oil will spread up and down the Inlet due to the influence of Cook Inlet's strong tides. Please revise the scenario location and ensure that the trajectory incorporates tidal currents. See below for additional comments regarding the possible worst-case spill location.

3.0 Supplemental Information

Section 3.1.2 provides background information on the crude oil transmission lines included in the plan. The description changes the maximum flow rate from the pipeline into the crude oil tanks from 100 bbl/her to 725 bbl/hr. Please clarify why the significant increase in maximum flow rate.

4.0 Best Available Technology

Section 4.2.3 describes Best Available Technology for pipeline source control. In the introductory paragraph, please specify diameter(s) of the 26 miles of piping between GPTF and MGS Onshore, as is done for the other sections of line mentioned.

In that same section, it mentions that Harvest maintains emergency repair clamps and composite sleeves. Please specify the types and sizes available.

That section also states that there are "manual/remotely operated block valves" in various key locations. Please specify which are manual and which are remotely operated.

Table 4-4 presents the BAT analysis for source control. It specifies a reduction in the number of 20" repair clamps from 6 to 3. Please explain the reason for this reduction and why the new, lower number is adequate.

In Section 4.3 BAT for Trajectory Analysis, consider adding the OSCAR model in place of the two options now removed (CISOM and ADIOS2).

5.0 Response Planning Standard

Section 5.2 calculates the response planning standard (RPS) for the onshore and offshore pipeline segments. For the onshore segment, the estimated time to detect a spill is now 16.5 minutes (15 minutes to detect the spill and 1.5 minutes for pumps to shut down). This is reduced from 20 minutes, following on a reduction from 1 hour in the most recent plan update. Please provide information to justify this reduction.

Additionally, we note that the 30% prevention credit is applied to the subsea pipeline RPS for "Annual cathodic profile inspection and ILI cleaning and diagnostic equipment." However, the associated equipment and procedures should be clearly described in the amendment. Please add this information.

For the offshore segment, the plan holder states that a pipeline break in the western segment of the subsea line would be the worst case due to the distance from CISPRI response assets. As related to the comments on the Kaloa Junction scenario above, CIRCAC believes the worst-case spill location would be in a deep channel with a strong current. Please reconsider the assumptions regarding the location that would represent the worst case and what is best suited to planning assumptions.