



*"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."*

October 14, 2016

Clare Pavia  
Alaska Department of Environmental Conservation  
P.O. Box 111800  
Juneau, AK 99811-1800

SUBJECT: Comment on "Notice of Proposed Regulation Revisions to 18 AAC Chapter 75 – Oil and Other Hazardous Substances Pollution Control and 18 AAC Chapter 78- Underground Storage Tanks"

Dear Ms. Pavia:

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

We have reviewed the proposed amendments to 18 AAC 75 to remove the non-tank vessel equivalent plan option from Alaska's spill response preparedness regulations. Since all operators to date have opted for the streamlined plan option using a primary response action contractor (PRAC), rather than to develop their own plans, it is not necessary to retain the latter option in the regulations. We agree that this is an appropriate revision, and one that ultimately improves clarity for regulated operators by removing unnecessary language.

Thank you for your consideration. If you wish to discuss further, our Director of Operations may be reached at (907) 283-7222 or via email at [SteveCatalano@circac.org](mailto:SteveCatalano@circac.org).

Sincerely,

  
Michael Munger  
Executive Director

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