

"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

February 18, 2020

**Tourism
Group**

John Harry
Industry Preparedness Program
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

**Alaska Native
Group**

SUBJECT: Comments on RFAI response regarding Tesoro Kenai Pipeline Company Oil Discharge Prevention and Contingency Plan, ADEC #: 15-CP-2083

**Environmental
Group**

Dear Mr. Harry:

**Recreation
Group**

Cook Inlet Regional Citizens Advisory Council (CIRCAC) submits these comments on the Tesoro Kenai Pipeline Company Oil Discharge Prevention and Contingency Plan (ODPCP). 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.

**Aquaculture
Associations**

This plan combines previously approved plans for the Kenai Pipeline, Marathon Refinery, and Tesoro Truck Terminal and incorporates the requirements of the Alaska Oil Discharge Prevention and Contingency Plan, U.S. Coast Guard, EPA, and DOT/PHMSA facility plan requirements.

**Commercial
Fishing
Group**

In light of the complexity of this consolidation and the required changes needed to make this plan a usable document, covering three different facilities, we were pleased to see that the Marathon plan writers chose to retain the State of Alaska ODPCP plan format. This format facilitated the plan review.

City of Kodiak

Overall, this is a comprehensive plan and should provide good guidance and information in the event of an incident and planned exercises. To further enhance the plan's clarity and utility, CIRCAC has provided the enclosed comments identifying areas within the plan that need adjustment to make the consolidation of these three plans more cohesive.

City of Kenai

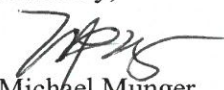
City of Seldovia

Our enclosed comments identify areas for improvement and recommendations for clarification throughout the 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 Munger@circac.org. CIRCAC requests a findings document to be supplied at the end of this plan review.

City of Homer

Sincerely,

**Kodiak Island
Borough**


Michael Munger
Executive Director

**Kenai Peninsula
Borough**

Cc: Graham Wood

**Municipality
of Anchorage**

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www.circac.org



Comments and Requests for Additional Information

Regarding

**Tesoro Kenai Pipeline Company
Oil Discharge Prevention and Contingency Plan
(15-CP-2083)**

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

FEBRUARY 18, 2020 DRAFT

General Comments

This plan does a thorough job of consolidating three plans for different facilities. In doing so, many areas of the plan will require some adjustments to preserve the utility and clarity required to maintain the usefulness of a consolidated plan. Correction of grammar and spelling errors along with a complete listing of acronyms is the first step to accomplish this task.

TITLE PAGE

KENAI PENINSULA Oil Discharge and Prevention Contingency Plan- While the title is descriptive it does not identify the plan holder. The title "*Kenai Peninsula*" could be confused with the Kenai Peninsula Borough.

RFAI: Recommend including the plan owners' name or some other descriptor somewhere in the title to specifically identify this plan as an industry plan. Consider; "Marathon Combined Kenai Peninsula Plan."

INTRODUCTION

General Information - Maximum Oil Storage for Truck Terminal shows the capacity in Barrels first then in parentheses it is converted to gallons. This differs from the format used to indicate the Kenai Pipeline Company and Kenai Refinery Storage Facility maximum oil storage capacities.

RFAI: Recommend presenting the storage capacities, for all facilities covered under this plan, in the same format to avoid confusion; e.g. Barrels first, then (gallons conversion in parentheses).

Worst Case Oil Discharge Amount - Likewise for these discharge amounts, the unit of measure is not as important as consistent formatting.

RFAI: Recommend using the same order as used in the Maximum Oil Storage quantities; i.e. Barrels first, then (gallons conversion in parentheses). Unless there is a regulatory requirement that the plan holder is trying to accommodate by using gallons first then (barrels in parenthesis), it is recommended that barrels be used first, because barrels are the customary unit of measure used to express these quantities of oil except for quantities less than 42 gallons.

Facility Normal Daily Throughput - These quantities should be expressed in the same format as the above-mentioned quantities.

RFAI: Recommend ensuring consistency throughout the plan regarding units of measure to avoid confusion and mistakes.

Objective - This section strives to explain the intended use for the plan and the facilities it covers. Because there are multiple entities involved in the ownership and operations for all three facilities listed in the plan - which include Andeavor Logistics LP, Kenai Refinery Storage Facility (KRSF), Truck Terminal (TTT) and Andeavor LLC Kenai Pipeline (KPL), Marathon Petroleum Corporation / Tesoro Alaska Company LLC - more detail should be provided. It is unclear which entity has the lead role when considering this plan. It appears

that up to this point Marathon / Tesoro is only mentioned once in the General Information table as being the owner of the subsidiary Andeavor LLC. While all but Marathon /Tesoro are listed elsewhere in this section, Andeavor (no specificity as to LLC or LP) is referenced as being referred to as “Company” or “The Company” and as a member of CISPRI, “utilize[ing] CISPRI personnel, equipment, and contractors for response to most spills from Company facilities.” It is important to clearly define the ownership relationship to identify the “Responsible Party” if an incident occurs.

RFAI: Recommend including a narrative that specifically identifies the owner/operator with principal authority regarding this plan.

Format - While this plan covers multiple facilities, operations, and regulatory requirements, this section spells out the regulatory framework this plan is meant to conform to. Most important, this section and the previous section declare that the plan is organized as described in 18 AAC 75.425(e) and provides a brief description of the principal information contained in each part. Combining multiple operations/facilities and various regulatory requirements can be confusing and difficult to understand. Presenting the information in this established format ensures the State’s requirements are met, Federal requirements are complied with, and that the document can be easily read and understood.

CIRCAC appreciates and applauds this approach.

Statement of Corporate Commitment (KPL), EPA Substantial Harm Statement (KPL), EPA - Applicability of Substantial Harm Criteria (Kenai Refinery Storage Facility), and (Truck Terminal)

This “Statement of Corporate Commitment - Oil Spill Contingency Plan - Kenai Pipeline Company” identifies Andeavor LLC and Kenai Pipeline Company, and commits the oil discharge prevention and response resources to implement the plan. It is signed by the refinery Vice President, Mr. Cameron Hunt. This section also contains EPA’s “Applicability of Substantial Harm Criteria” forms for each of the facilities covered under this plan. However, the authorizing signature on two of the three forms is that of Mr. John Roark, Vice President of Terminalling, Transportation & Storage. However, there is no corporate commitment signed by Mr. Roark. Mr. Roark’s signature only verifies that the information contained on the form is true, accurate, and complete. This demonstrates the importance of identifying the principal authority for all three facilities covered by this plan.

RFAI: Recommend including in one Statement of Corporate Commitment (SOCC) specific language that covers all three facilities and identifies one individual with authority to commit resources or individual SOCC’s for each facility.

Additionally, the Applicability of Substantial Harm Criteria form titles are different on each form. The form for the Truck Terminal has the form’s title omitted and only states “Truck Terminal.”

RFAI: Recommend titling each form in a similar manner to include the form title and the facility it pertains to, as shown on page ix, i.e. "EPA- Applicability of Substantial Harm Criteria (Kenai Refinery Storage Facility)."

SECTION 1 RESPONSE ACTION PLAN

1.1 Emergency Action Checklist

1.1.1 Response Action Alert Notification and 1.1.2 Spill Action Checklists

Each section does a good job of describing what an employee encountering or responding to a release of oil or other emergency should do. This could be enhanced as suggested below.

RFAI: Consider including any actions taken by personnel to abate or stabilize the situation in the information to be reported to the appropriate control room operator, as this information will be important to response personnel. Additionally, we recommend providing these steps in an electronic format to be loaded on employee phones for easy access in lieu of a wallet-sized card.

Table 1.1-2 Area Supervisor

This table contains good and useful information. In one instance, it contains what seems to be instruction better suited to a first responder.

RFAI: Recommend modifying the Area Supervisor's statement to "Instruct response personnel to stop or control the spill and restrict the spread of oil if safe to do so'." Include in table 1.1-1 First Responder "If possible, and safe to do so, stop or control the spill. Attempt to restrict the spread."

1.2 Reporting and Notifications

This section specifies that the QI, IC, or designee will make agency notifications through personal and direct communication. However, it also contains the somewhat ambiguous statement "If a spill is detected the following information must be provided to the Qualified Individual, Incident Commander or his designee, or it may be reported to the agencies. Since the QI, IC, or their designee have been tasked to make the agency notifications the phrase "or it may be reported to the agencies" seems out of place.

RFAI: Please clarify this statement or correct it if it is a typo. We suggest, "so it may be reported..."

Table 1.2-1 Spill Reporting Sequence

The title of this table "SPILL OBSERVER REPORTS SPILL TO:" Tank Farm or Unit Supervisor (call 911 if necessary) seems to be contradicted by the second box. The second box down has printed in red "FIELD / SPILL OBSERVER REPORTS SPILL TO A QUALIFIED INDIVIDUAL (ONLY ONE NEEDS TO BE CONTACTED)" (Call 911 if necessary) and lists one primary and five alternate contacts - all of which are QI's. However, section 1.1.1 identifies the Control Operator as the individual to receive the initial notification.

RFAI: Please clarify if a spill observer should report to a tank farm operator, unit supervisor, control room operator, or QI. Recommend providing full name for the National Response Corporation Alaska instead of the acronym NRC, to avoid confusion with the National Response Center (often referred to as the NRC)

Table 1.2-3 Oil Spill Discharge Information

This form contains all the required information to report a spill. However, as a printable form, the current layout does not provide adequate space to list immediate response actions. Additionally, it asks for some information that seems off topic. The reporting party block asks if “Meeting Federal Obligations to Report” and “Confidential?”.

RFAI: Consider modifying the form to allow adequate space to capture all incident information or include instruction to create an attachment as necessary. Please clarify the type of information that would be placed in the “Confidential?” section and who would make this determination.

1.3 Safety

1.3.1 Initial Response

The opening sentence for this section indicates that the company Safety Officer (as referenced in Table 1.2-4) will be responsible for the preparation of the Safety Plan. However, Table 1.2-4 depicts the ADEC Spill Report Form. In previous sections, the Safety Coordinator is referenced as having specific duties. Table 1.2-5 lists a Safety Coordinator but does not list a Safety Officer.

This section also describes the use of self-contained air packs and /or organic vapor respirators (dependent on-air monitoring results), and goes on to reference SCBA’s and the importance of assessing airborne concentrations of toxic chemicals for appropriate respirators and personal protective equipment. Table 1.3-1 Benzene Exposure Limits, spells out which respirator should be used for a specific benzene level along with a footnote that cites Company policy. The section does not specify respirator use for characterizing spill hazards or identifying the hazard for a particular incident, i.e. what respirator should be used when determining the concentration level of a toxic gas or vapor? Some toxics have poor detection indicators and require use of an SCBA or other supplied air respirator. This section also contains a redundant statement.

RFAI:

- *Please clarify how or where the ADEC Spill Report Form indicates the Safety Officer’s responsibilities.*
- *Please clarify if the Safety Officer is an additional Safety position or is also the Safety Coordinator.*
- *Recommend standardizing terminology for self-contained breathing apparatus.*
- *Recommend clarifying the steps taken to determine appropriate respiratory protection or provide a link to reference material that spells out the appropriate steps.*

1.3.3 Facility Evacuation Plan for Total Evacuation

The KPL Control Room Boardman Operator Shall:

This section contains bullet points that describe actions to be taken. The first bullet point contains a syntax error. The last bullet should be edited for clarity.

RFAI: Recommend clarifying the language in the first and last bullet points.

Process Unit or Truck Terminal Evacuation:

The Affected Control Room Boardman Shall:

This section contains bullet points that describe actions to be taken. The first bullet point contains a syntax error.

RFAI: Recommend including additional information to clarify where and how personnel from the Process Unit or Truck Terminal should safely evacuate the affected areas (i.e., "Follow established evacuation routes using crosswind routes whenever possible to the nearest muster point). Recommend including reference to Figure 1.3-3.

Total Facility Wide Evacuations (Kenai Refinery Storage Facility):

The Affected Control Room Boardman Shall

This section contains bullet points that describe actions to be taken. The first bullet point does not read well. The second and third bullet points seem redundant. The last bullet should be edited for clarity.

RFAI: Recommend clarifying the language to be more specific about what and how actions should be taken. Recommend adding facility wide broadcast on facility loudspeaker system and radio transmission to include the location of the emergency or other areas to be avoided, and wind direction as part of every facility evacuation announcement.

Figure 1.3-2 Kenai Refinery Evacuation Routes

This figure shows a plot plan of the refinery and escape routes. However, the evacuation routes are difficult to recognize.

RFAI: Recommend making route paths and access points bolder to stand out better.

Figure 1.3-3 Truck Terminal Evacuation Routes

This figure shows the Nikiski Truck Terminal in a very simple facility layout design. However, the image does not do a very good job of indicating where personnel should go. The diagram shows two evacuation staging areas and an evacuation assembly area. One evacuation staging area is located outside of the fenced tank farm with no indication of path or route to the staging area. Understandably, personnel should evacuate crosswind or upwind when necessary. However, there is no indication of an exit along the fenced area other than the two gates noted in the same area of the diagram.

1.3.4 Alaska State Troopers Response

This section includes some of the ways the Alaska State Troopers (AST) may be utilized during an emergency response.

RFAI: Recommend including who has the authority to notify the AST.

1.3.5 Fire Brigade Response

This section indicates there is an on-site firefighting coordinator who is also the fire brigade chief as identified in Section 1.2. Table 1.2-6 identifies the Operations Section Chief Alternate (a member of the Incident Management Team) as the firefighting coordinator.

RFAI: Please clarify the on-site firefighting coordinator/fire brigade chief role, as the on-site fire brigade is mentioned throughout the plan. Also recommend standardizing terminology for the fire brigade as it is also listed as the "Company Fire Brigade" and the "Andeavor Fire Brigade."

This section indicates that the facilities maintain 30-pound dry Ansul Class B-C portable extinguishers and 100-pound Class B-C wheeled extinguisher units.

RFAI: Recommend including information about location of the fire extinguishers (i.e. 30- pound fire extinguishers are located throughout the facility and are conspicuously marked, 100-pound wheeled extinguishers are located at...).

1.3.6 Characterization of a Response Site

This section lists some of the protocols to be observed during site characterization. The third bullet point indicates respiratory protection should be utilized for the initial atmospheric monitoring of the spill site. However, the use of an SCBA is neither suggested here or earlier when quantifying airborne toxicity levels, to protect safety personnel while establishing proper respiratory protection levels. This section also references the Site Safety Officer.

RFAI: Recommend citing the technique provided in the CISPRI Technical Manual (CTM), Site Entry Procedures and Site Characterization to ensure responder safety. Please clarify if the Site Safety Officer or the Safety Coordinator will establish safety zones around the spill site. Recommend using consistent terms to avoid confusion.

1.3.7 Deployment Considerations and Limitation

This section offers guidance to be considered when establishing site layout and control. However, the last bullet point offers one possible example for on-water operations that does not follow the example provided in the CISPRI Technical Manual (CTM). While every vessel configuration is somewhat different, Hot, Warm, and Cold zone layout should follow training protocols for consistency and ease of recognition.

RFAI: Recommend referencing CTM's "Site Control Onboard Typical Contract Vessel" for on water operation's Hot, Warm, and Cold zone layout and adopt a similar description.

1.3.8 Site Security

1.3.8.1 KPL Site Security

The first sentence contains an error in punctuation.. This section states, "Escorts will remain in place until no one except emergency response personnel may enter the emergency area." This statement is somewhat confusing.

RFAI: Please clarify why and where escorts will remain in place.

1.3.8.2 Kenai Refinery and Kenai Refinery Storage Facility

The first sentence contains an error in punctuation. This section repeats the statement, "Escorts will remain in place until no one except emergency response personnel may enter the emergency area."

RFAI: Please clarify the statement.

1.3.11 Emergency Medical and First Aid Stations

This section states, "The Company has a Medical Facility at the Refinery. The facility is manned during normal working hours by an Advance Nurse Practitioner. The full time Nurse Practitioner is the on-site Medical Provider." It is unclear who provides medical care.

RFAI: Please clarify the difference between the Advanced Nurse Practitioner and the Nurse Practitioner.

1.4 Communications

This section lists the appropriate Alaska Administrative Code (18 AAC 75.425(e)(1)(D)) and the associated cite text under the section title. This is a very helpful addition to the plan content.

RFAI: Recommend including the appropriate regulatory citation(s) at the beginning of each section.

1.4.1 Initial Spill Communications

This section references Table 1.4-1 and 1.4-2. However, table 1.4-2 could not be located.

RFAI: Please clarify if table 1.4-2 exists or if the reference is erroneous.

The second paragraph of this section uses past-tense verbiage. As a contingency plan, the text should direct personnel to do specific tasks and should not refer to those actions as if they have already happened. Past tense verbiage could mislead a reader to believe that the action has been accomplished and does not need to be addressed.

RFAI: Recommend removing past tense verbiage (i.e. use will instead of would; is instead of was).

1.4.2 Major Spill Response Communications

This section uses the terms CIPSRI Command Center, communications center, and mobile command center. However, the CTM does not use these terms in describing their incident command communications dispatch center or dispatch center. This section contains a detailed description of the CISPRI mobile Command Center. However, there is no description of this asset in the CTM.

RFAI: Recommend using terminology consistent with the CTM with clear descriptions of their roles and responsibilities. Recommend including a similar detailed description of this asset in the CTM or a specification sheet and photos of the asset.

This section mentions "Company" Communications Unit Leader as the individual who will "establish and supervise the communications center under the directions of the Logistics Section Chief. However, the plan does not identify what the duties of this position are, other

than, “prepares necessary plans...”, nor who will fill the role of the CCUL (neither in this section nor in 1.2).

RFAI: Please identify who will fill the role of Company Communication Leader. Please clarify the role/duties of the “Company” Communications Unit Leader.

1.5 Oil Spill Deployment Strategies

RFAI: Recommend including the appropriate regulatory cite(s) at the beginning of each section.

1.5.1 General

This paragraph contains a syntax error. "The Incident Commander will make an initial assessment and, if required, will *mobilization* additional manpower and equipment from CISPRI and other industry operators."

RFAI: Please clarify the statement.

1.5.2 Company Deployment

This section points out the steps taken when the Company deploys personnel and equipment and is well written. The second step indicates that the Incident Commander or their designee will send the Company Initial Assessment Team or selected team members using overflights and on-site inspections to evaluate the magnitude of the spill and determine health and safety actions which are needed. However, there is no indication if UAV's would or could be used to accomplish part of this tasking for onshore spills at all three facilities. Additionally, there is a syntax error further on in the section.

RFAI: Recommend including some detail regarding the use of UAV's to increase personnel safety and the timeliness of the initial overflight assessment.

1.5.2 CISPRI Deployment /1.5.3 CISPRI Deployment

These sections share the same title and have virtually the same information repeated.

RFAI: Please clarify what these sections are or should be communicating.

1.5.4 Response Times

This section states that "CISPRI is less than 10- minutes' drive north on the Spur Highway" and "Oilfield service contractors and equipment are locally available and are typically on-site at the refinery standard working hours".

RFAI: Recommend including the full name of the “Spur Highway”. Please clarify ‘on-site at the refinery standard working hours’.

1.5.5 Waste Management

This section indicates waste management strategies, permit summaries, and waste management plans are contained in the CISPRI Technical Manual (CI-WM-1 through 6, CI-LP-6, and Appendix D). However, it does reference CTM, CI-W-7 & 8, equipment decontamination and oiled debris (respectively).

RFAI: Please clarify the exclusion of these tactics from waste management direction.

1.6 Spill Response Strategies

Scenarios- General

Description of cleanup (specifically recovery under 18 AAC 75.425 (e)(1)(F)) operations seems nebulous. No clear indication of how much temporary storage is available, and what the total daily recovery for all recovery assets is other than Table 1.6-21 that outlines vacuum truck and pump daily recovery rates. Unclear how many temporary storage tanks are available and being used and whether containment cells (as mentioned in Scenario #1) will be built/used in Scenario 2 (no mention of construction/use in Table 1.6-11). No highlighted title marking Response Scenario # 2. Scenario #3 format does not match Scenario's 1 & 2.

This section includes the statement, "Additional operational procedures are available via Company's PRISM electronic information system for transfers, transfer monitoring, and emergency shutdown," immediately following Table 1.6-8

RFAI:

- *For continuity, please update scenario tables to match overall plan format.*
- *Recommend that the "Additional operational procedures" or an explanation of the PRISM electronic system be included in the plan*

Table 1.6-1 Failure of Tanker or Barge Loading Hose

This table identifies the spill mitigation steps to be taken by the dock person-in-charge (PIC). However, it is unclear why or how the dock PIC could transfer product from the overflowing tank, to a tank with available space. This seems to be the responsibility of the tanker or barge PIC. Additionally, this table is titled "Failure of Tanker or Barge Loading Hose".

Likewise, this table indicates the dock PIC will begin recovery operations with vacuum trucks, skimmers and pumps. While this equipment may in fact be used at some point and place, including it here seems too prescriptive.

RFAI: Please clarify how a hose failure would require product to be transferred from an overflowing tank to a tank with available space. Recommend including a more generic statement like, "Begin spill response and mitigation procedures as per..."

Table 1.6-2 Storage Tank Overflow

This table contains the same prescriptive recovery operation instructions as table 1.6-1. However, in this instance it is more appropriate. That said, it might be best to follow the response procedures laid out elsewhere in the plan, where the incident commander coordinates response efforts.

RFAI: Recommend including a more generic "Begin spill response and mitigation procedures as per..."

Table 1.6-3 Storage Tank Failure

This table contains good information to be used by the facility operator, pumper, or tank farm operator. However, it does not instruct these individuals to describe to someone (Control room operators) the nature and magnitude of the tank failure (i.e. catastrophic tank failure, crack in a weld, puncture of tank wall, gasket failure, etc.). This kind of information helps to direct assistance and communicates the size of the incident.

RFAI: Recommend including description of tank failure and magnitude to be reported to the control room operator for distribution to command and control personnel. Recommend including a more generic "Begin spill response and mitigation procedures as per..."

Table 1.6-5 Earthquake

This section does not provide any instruction if damage is found.

RFAI: Recommend adding instructions for operator to follow in the event damage from seismic activity is discovered upon visual inspection, including notifications.

Table 1.6-7 Terrorist Threat

This table seems light on instruction for a possible terrorist threat.

RFAI: Recommend reviewing Federal guidance for possible improvements to this procedure.

1.6.2 Response Scenario # 1 KPL Tank 2407**Recovered Product/Waste Management**

This section appears repeated in the electronic form presented.

RFAI: Please verify and delete as needed.

In the first bullet under "RECOVERED PRODUCT/WASTE MANAGEMENT, the statement is unclear as to its purpose.

RFAI: Please clarify the intent of the statement.

The third bullet indicates that construction of two (initial) 100 x 150 bermed, lined containment cells at KPL Marathon LACT area for temporary waste management will take place. However, nowhere in the plan does it indicate how they are to be constructed, who will do it, or their capacity (for RPS calculation).

RFAI: Please clarify how the containment cells will be constructed and their capacity.

Table 1.6-9 General Response Objectives & Strategies - Scenario 1, Day 1

This table does a good job of lining out the objective and strategies. However, "Safety of the Environment" is missing. This strategy is one that routinely appears on every spill exercise ICS 202 form; a strategy that is supported by the strategies listed further on in the table.

RFAI: Recommend adding Safety of the Environment to the Safety Strategies.

Table 1.6-10 Tactical Objectives Scenario 1, Day

This table depicts a checklist style document of benchmark actions to be taken by each ICS section.

- Command & Command Staff - Unified Command Section - in the 1200-1800 shift and again in the 1800-0600 shift, there is a reference to “CMT”. However, CMT is not listed in the Acronyms Appendix.
- Planning Section - indicates the Resource Unit should develop T-cards in each of the three shifts covered.
 - Resource Unit in the 0600-1200 shift indicates “Complete org chart” and this instruction repeats in the 1200-1800 shift but there is no instruction to establish or start an org chart.
- Operations Section-Supervise - lists Land Based Recovery operations twice in each of the three shifts listed.
- Logistic Section - 0600-1200 established Command Post. While it is correct for the Logistics section to be responsible for locating and establishing a command post, the same task is also listed as being accomplished by the Unified Command- specifically at CISPRI. Logistics Section across all shifts reference the IRT & SNRT personnel. While IRT is listed in the Acronyms appendix SNRT is not. Additionally, in the 1200-1800 shift “SCAT” is referenced. However, SCAT is not listed in the Acronyms Appendix.
- Planning Section, Environmental Unit - the 1200-1800 & 1800-0600 shifts both reference the development of and preparation for SCAT operations. However, SCAT is not listed in the Acronyms Appendix.
- Finance Section - the 0600-1200 shift references the establishment & publishing of a claims number. While the likelihood of a claim being filed within the first 24 hours of this spill scenario may be viewed as a rare event, if a claims number is to be established, it should follow that the Responsible Party should be prepared to act on any claim submitted and to track those claims to aid cost tracking. However, there is not instruction regarding the tracking of claims.

RFAI:

- *Please clarify if T-card development is intended as the primary means to track resources or is a backup means in the event electronic tracking fails.*
- *Recommend Resource Unit to establish org chart, revise or update org chart, and complete org chart to demonstrate the development of this document throughout the day one work period.*
- *Please clarify the need to repeat supervision of land-based recovery operations twice per shift.*
- *Recommend directing the Unified Command to report to the Command Post at a specific location or reference the generic "Command Post" if applicable.*
- *Please clarify the meaning of “CMT” as used in the Command & Command Staff section of this table.*
- *Please clarify the meaning of “SNRT” as used in the Logistics Section of this table.*

-
- *Please clarify the meaning of “SCAT” as used in the Planning and Logistics sections of this table.*
 - *Recommend including instruction regarding tracking claims by the Finance Section.*

Table 1.6-11 Scenario 1 Strategy –Day 1

- Safety - 1200-1800 references “Continue to re-route traffic control (as needed)” and the 1800-0600 references “Continue to maintain traffic control.”
- Notification - references “Establish and maintain local community leaders (Police and Fire). This seems to be a mixed message. Law enforcement and Fire Dept. are somewhat different from community leaders. Likewise, those entities have already been established.
- Stopping Discharge at Source & Lightering - 1200-1800 references using a grader to make a trench along KPL road and references the CISPRI Technical Manual (CTM) CI-IL-3 and CI-IL-9. CI-IL-3 does a fair job of describing culvert booming/ blocking. However, CI-IL-9 does a poor job describing the inland tactic as referenced in this table. The tactic as characterized in the table does a better job of describing the work to be done than CI-IL-9. Whereas. CI-IL-2 Trenches and Slots seems to meet the intent as described in the plan.
- Preventing or Controlling Fire Hazards - does a good job of bulleting actions to control fire hazards but does not address fire prevention. Securing or removing ignition sources is the most important fire and explosion prevention measure to be taken. Securing or removing ignition sources was referenced in table 1.1-1 First Responder, but should be repeated here, as other parts of this table have repeated actions addressed in previous sections.
- Protection of Environmentally Sensitive Areas and Areas of Public Concern - references the CTM CI-SA-1 & 2. The online CTM continues to reference the Cook Inlet and Kodiak Sub-area Plans. The ADEC has determined the CTM to be open for review in conjunction with ODPCP review.

RFAI:

- *Please clarify “re-routing traffic control”. Recommend using “Implement traffic control, as needed” throughout operations.*
- *Recommend clarifying directions in the 0600-1200 Timeline-Actions Taken for establishing contact with local community leaders, Law Enforcement and Fire Dept.’s and maintaining contact. Consider adding the Dept. of Transportation in the Notification 0600-1200 Timeline-Actions Taken.*
- *Recommend reconsidering tactics for Stopping Discharge at Source & Lightering during the 1200-1800 Timeline-Actions Taken.*
- *Recommend adding “Secure or remove ignition sources” to the Preventing or Controlling Fire Hazards Section in the 0600-1200 Timeline-Actions Taken.*
- *Recommend updating the CTM to reflect current terminology regarding the Regional and Area plan- specifically the Arctic Western Alaska Area Plan.*

Table 1.6-13 Tactical Objectives- Scenario 1, Day 2

This table is a checklist of the Tactical Objectives for Scenario 1, Day 2. The table uses numerous acronyms to denote various sections of the Incident Command. However, they are not listed in the Acronyms and Definitions appendix.

Table 1.6-14 Scenario 1 Strategy- Day 2

Safety- refer to comments above for Table 1.6-9 General Response Objectives & Strategies – Scenario 1, Day 1.

Table 1.6-32 - Tactical Objectives – Scenario 3, Day 1

This table, while similar, is in a different format from the Tactical Objectives tables for Scenarios 1 & 2.

RFAI: Recommend tables of similar content maintain a uniform appearance for easy recognition.

1.6.5 Response Scenario #4 – Truck Terminal Tank 103

Under “Response Description” a reference is made to Figure 1.6-1 which appears to be intended as a depiction of the truck terminal secondary containment. Figure 1.6-1 does not exist in this plan revision though there is an old Figure 1.6-1 which is a deleted Tesoro org chart under Scenario #1.

RFAI: Please update this section to reference appropriate figures.

Also under “Response Description” (last paragraph), procedures for contaminated snow removal and disposal through the refineries NPDES-permitted oily water sewer system is mentioned, but it is slim on details of how “manual” and “supersucker” removal/transport from spill site to the oily water sewer system will take place. Further, this response activity is not specifically mentioned as a tactic in the CTM. No clear process or procedures, e.g. snow removed manually by loaders will be hauled to a lined holding area located (name the area) for processing through the refineries permitted oily water sewer system.

RFAI: Please update this section with clearly outlined process/procedures for carrying out snow removal and disposal.

Table 1.6-47 Scenario 4 Strategy -Day 1

Under vi & vii – “develop team to construct temporary piping” - strategy tables in Scenarios 3 and 4 both contain actions for construction and management of temporary piping with one reference to its presumed use for transport of oily liquids to existing tanks (e.g. “construction teams continue to install temporary piping to available tankage.”). There is no real detail or outlined procedures, plans or anticipated manpower requirements to explain how this is to be carried out.

RFAI: Please update this section with clearly outlined process/procedures and manpower required for pipeline construction.

SECTION 2 PREVENTION PLAN

2.4 Conditions that Might Increase the Risk of Discharge

This section lists conditions associated with petroleum transport/transfer operations that could increase the risk of an accidental discharge, naming Earthquakes, Tsunamis, and Volcanoes in the first bullet point. However, the descriptions for these are inconsistently identified. Only seismic activities are identified as 2.4.1 Seismic Activities. Earthquake, Tsunami and Volcanic Eruption have no numeric identification, while Winter Conditions, Sabotage and Vandalism are numbered 2.4.2 and 2.4.3 respectively. Making the argument that Earthquakes, Tsunamis and Volcanic Eruption all share seismic activity, it still does not allow those tables/figure to be located easily within the table of contents. In fact, they are not listed.

RFAI: Please update this section to clearly identify tables/figures that can be located using the Table of Contents.

SECTION 3 SUPPLEMENTAL INFORMATION

3.1 Facility Description and Operational Overview

3.1.1 KPL

3.1.1.1 KPL General Facility

This section mentions Transmix being offloaded at the KPL truck LACT. Transmix and LACT are not listed in the Acronyms and Definitions Appendix.

RFAI: Please clarify what Transmix and LACT are. Recommend inclusion in the Acronyms and Definitions Appendix.

This section also states “General schematics of the crude oil, black products and clean products systems are provided...”, but no real description of “Black Products” is given here or in the Definitions Appendix.

RFAI: Please clarify the use of the term black products.

Table 3.1-4 Kenai Refinery Storage Facility Tank Summary

In the electronic and printed format, this table is not entirely legible.

RFAI: Please update this table to be legible in the electronic and printable versions.

3.3 Incident Command System (ICS)

3.3.6 Documentation

At the end of the opening paragraph the “USCG Oil Spill Field Operations Guide” [FOG] is referenced. This is an old reference as the FOG was replaced and should instead reference the USCG Incident Management Handbook (May 2014). Additionally, Figure 3.3-2 Incident

Command System Organization appears at the end of this paragraph in the electronic and printed version.

RFAI: Please update this paragraph to reference the USCG Incident Management Handbook (May 2014). Please adjust the figure title to appear on the electronic and printed page with the cited figure.

Figure 3.3-2 Incident Command System Organization

This figure does not show a place for a Regional Stakeholders Committee within the Incident Command System Organization.

RFAI: Recommend adding an "as needed" block associated with the Liaison Officer within the Incident Command System Organization chart to recognize a Regional Stakeholders Committee as provided for in the AWA Area Plan.

3.3.7 Incident Management Team Duties and Responsibilities

This section lists duties and responsibilities for members of the incident command. The Command Staff includes the Liaison Officer and his/her duties. The description of duties provided are succinct and mostly complete. While the Liaison Officer is listed, and the description of duties does include "Also advises interested groups, corporations, and organizations of actions the IMT is taking and address concerns", it does not include the Liaison Officer's duties when working with a Regional Stakeholders Committee (RSC).

RFAI: Recommend paraphrasing the description provided in the Arctic & Western Alaska Area Plan section 2400 – LIAISON OFFICER (LOFR) regarding the LOFR coordinating with a Regional Stakeholder Committee (RSC) if one is activated.

3.6 Response Equipment

3.6.1 Kenai Refinery Storage Facility Spill Control Equipment

The table in this section lists equipment contained in the HazMat response trailer. The table lists "Kitty Pools" as part of the HazMat Trailer's Inventory rather than "Kiddie Pools".

RFAI: Please clarify the use of "Kitty Pools."

This table also includes two "portable spill containments" but there are no additional details indicating the specific type, size, capacity, etc.

RFAI: Recommend providing more information on these portable spill containments including type, size, storage capacity, etc.

The table lists only one full-face respirator, though the plan does indicate elsewhere "approximately 20 SCBAs are available in the fire hall.". While there is ample PPE (including BR suits) in this HazMat response trailer to outfit multiple personnel, it seems two full-face respirators would allow the "buddy system" approach and provide a safer response, if respirators were needed.

RFAI: Recommend adding additional full-face respirators to this kit to enhance the overall kit and complement the existing suite of PPE.

3.10 Protection of Environmentally Sensitive Areas

3.10.1 Environmental Resource Information

This section lists various resources for reference material available at CISPRI and via Web access. The AOOS Portal is listed as an asset regarding Cook Inlet area marine and coastal data, including the Web address to the Cook Inlet Response Tool (CIRT). While the AOOS portal does contain a plethora of information, it is simply the platform where the CIRT is housed. Additionally, CIRT is where the web address will take the user.

RFAI: Recommend rewording the statement to accurately describe the resource as the Cook Inlet Response Tool.

3.11 Bibliography

The old “Coast Guard Field Operations Guide” is referenced.

RFAI: Please update “Coast Guard Field Operations Guide” to “Coast Guard Incident Management Handbook (May 2014)”.

SECTION 5 RESPONSE PLANNING STANDARD

5.1 ADEC Response Planning Standards

The text following Table 5.1-3 is confusing due to its location. The text applies to the KRSF but follows Table 5.1-3 Response Planning Standard – KPL.

The text contains the statement “The “outside the secondary containment” applicability is based upon natural drainage...” However, there is no additional RPS reduction credit shown in table 5.1-1 or the next two tables contained in this section.

RFAI: Please clarify the text. Consider adding a title above the text to tie it to the appropriate facility or moving the text to just below table 5.1-1 Response Planning Standard - Kenai Refinery Storage Facility. Additionally, please clarify how and where the “outside the secondary containment” RPS reduction credit applies.

5.1.2 Crude Oil Pipeline

This section begins; “The RPS volume for the Middle Ground Shoals pipeline is defined in 19 AAC 75.436 applying calculations for crude oil pipelines.”

RFAI: Recommend correcting this typographic error.

5.2 Summary of Discharge Estimates

This section begins with, “Table 5.2-1 provides a summary of the potential discharge volumes from this facility...”. Because this plan is a combination of multiple facility plans, it

is important to be specific when talking about any facility or combination of facilities covered in the plan.

RFAI: Please clarify which facility or facilities this section covers.

5.3 USCG Worst Case Discharge Response Planning Standards

This section provides the worst-case discharge planning standard as calculated in USCG regulations under 33 CFR Part 154.1029, but does not identify the facility that this calculation applies to.

RFAI: Please clarify the facility(ies) to which this planning standard applies.

5.4 EPA Worst Case Discharge Response Planning Standards

5.4.1 KPL; 5.4.2 KRSF; 5.4.3 Truck Terminal

These tables contain very good information regarding what appears to be the Worst-Case Discharge for each of three facilities. However, unlike Section 5.3 and 5.5 it does not provide the applicable CFR cite to help understand the basis for this information. In a plan that combines multiple facilities and multiple regulatory requirements by multiple State and Federal agencies (ADEC, USCG, EPA, DOT/PHMSA) the inclusion of applicable regulatory sites helps to ensure compliance and compliance verification.

RFAI: Please clarify the applicable regulatory Worst Case Discharge cite(s) for the KPL, KRSF, and Truck Terminal facilities.

APPENDICES

APPENDIX B DRAWINGS

B.1 KPL Drawings

Facility Layout and Drainage Map for the KPL facility is difficult to read in the electronic format. While facility drainage is discernable, the font size and clarity of the text is marginal at best. Likewise, this map is very busy and difficult to parse out some of the details such as equipment ID's, which are illegible. Nor is there a description of what equipment resides at these locations.

RFAI: Recommend a different font size and style to aid in electronic viewing including clarification of the Explanation (key) symbols and descriptions.

APPENDIX C ACRONYMS & DEFINITIONS

C.1 Acronyms

Acronyms list is incomplete and should be updated to identify acronyms used throughout the plan.

RFAI: Recommend reviewing plan for acronyms missing from this list and include them.

The term LACT is used 32 times in the plan as either “Marathon LACT area” or “Marathon LACT unit” without being spelled out.

RFAI: Add acronym for “LACT” (Lease Automatic Custody Transfer)

“MSO-Marine Safety Office” is included in the acronym list but this term is no longer used in general and is not used at all within the plan.

RFAI: Remove “MSO-Marine Safety Office” from the acronym list

C.2 Definitions

Contract or other approved means includes the acronym NVIC in a context that indicates the text came from a U.S. Coast Guard Navigation and Vessel Inspection Circular, but does not identify that NVIC number. Nor is NVIC listed in the acronyms list.

Recommend identifying the NVIC quoted or change the context of the statements regarding contracts. List NVIC in list of Acronyms.

Worst Case Discharge (EPA) (Storage Facilities) - appears at the end of the Wildlife Rescue definition.

RFAI: Recommend correcting this typographic error, i.e. separate Worst Case Discharge (EPS) (Storage Facilities) from the definition for Wildlife Rescue to provide easy identification of each definition.

Worst-case discharge (vessels) provides an incomplete definition. The definition provided identifies “For vessels, not less than—” but does not state less than what; XX tonnage, XX feet in length, XX bbls storage capacity? Additionally, the title is not depicted in the same format as Worst-Case Discharge (EPA) or Worst Case Discharge (Pipeline). This is a small syntax error, but to ensure continuity of content it should be corrected.

RFAI: Please clarify the standard for vessel Worst Case Discharge. Recommend correcting Syntax error.