



Comments and Requests for Additional Information

Regarding

Harvest Alaska, LLC

Oil Discharge Prevention and Contingency Plan

(17-CP-2081)

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

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General Comments

We suggest that the plan would benefit from a careful review of all figure numbers and figure references.

PART 1. RESPONSE ACTION PLAN

1.5 DEPLOYMENT STRATEGIES

1.5.2 Transport of Resources

Swanson River Oil Pipeline

Page 1-18 states that where there is no road access, personnel and equipment will be transported via off-road vehicles and helicopter. The plan indicates there is one off-road vehicle at SRF. The timeframe for transporting personnel and equipment is not clearly communicated.

RFAI: Please clarify if the off-road vehicle at SRF is sufficient to move the necessary number of personnel and/or equipment to safely evaluate, delineate, and respond to a spill from the SROP as intended.

1.5.3 Transporting Equipment and Personnel in Adverse Weather

This section indicates that access to staging areas in adverse weather will be accomplished by helicopter, fixed wing aircraft, marine vessels, barges/landing craft, road vehicles and/or off-road vehicles. However, adverse weather is defined earlier in this section as "weather conditions that may act against or abnormally hinder response efforts." While weather may be "adverse" in many ways, all modes of transportation mentioned are subject to at least some limitations.

RFAI: Please clarify how aircraft, marine vessels, and barges/landing craft will be able to operate in adverse weather, or provide more specific information regarding what is available for use in different types of "adverse" conditions.

1.6 RESPONSE ACTIONS AND STRATEGY

1.6.5 - Temporary Storage and Ultimate Disposal

Paragraph 2 indicates that, "Fluids can be transported to MGS Onshore or SRF." However, there is no indication of how this will be accomplished and the volume of storage containers.

1.6.5 - Temporary Storage and Ultimate Disposal

RFAI: Please provide a plan for fluid transport in terms of what type of fluid storage will be used, where these storage containers are located, how long it will take to get them on-scene, what type of vehicles will be used to transport storage containers, and how long it will take to get them on-scene.

1.6.8 - Scenarios

Scenario 1:

Table 1-7 (Continued) Response Actions-Pipeline Rupture at McArthur River Crossing, Summer

(i) Stopping Discharge at Source: This section indicates that the remotely operated pipeline valves are shut in by the control room operator, or can be manually shut in. But the plan does not indicate if or when the remote valve closure is verified. Additionally, there is no indication of a procedure to complete manual valve shut-down in the event of a remote shutdown failure.

RFAI: Please clarify if and when a remotely closed valve is verified as closed or confirmed closed by response personnel in the event of a remote closure failure. This would benefit from an estimate of the time it would take to determine failure of the remote operation and initiation and completion of the manual shut-in.

Table 1-7 (Continued) Response Actions-Pipeline Rupture at Chakachatna River Crossing, Summer

The table's title is confusing.

RFAI: Please clarify if this is for the Chakachatna River or McArthur River.

Table 1-7 (vii) Spill Recovery Procedures

The plan holder states that by hour 3 Task Force 1 (TF-1) begins deploying pumps in the boomed areas of the river to recover the contained liquid. However, the CISPRI Technical Manual (CTM) tactic indicated refers to CI-IL-1, which is misleading. The CTM CI-IL-1 is actually split into two parts 1A & 1B- Containment Berms, Dikes & Dams and Construction of Berms, Dikes & Dams. The section goes on to indicate Task Force 2 (TF-2) will arrive by hour 2 to begin containment and recovery on land to prevent additional oil from reaching the river. "The personnel deploy boom and pumps to contain and recover the oil." This section cites CTM CI-SL-6 which is tactics for Shoreline Cleanup using Sorbents & Vegetation Cutting: This tactic describes the use of sorbent material and the removal of oiled vegetation from a shoreline. However, it does not seem to match the intent of the mission for TF-2 but more to the mission of TF-4. The tactics referenced for each Task Force don't seem to align to the adjacent task force mission in the table.

Table 1-7 (vii) Spill Recovery Procedures (Continued)

RFAI: Please clarify if the table is misaligned or a function of the electronic version. If it is not an electronic version issue the tactics to be employed by each task force should be correctly identified and properly aligned within the table to prevent confusion.

Table 1-8 Oil Recovery and Handling Capability - Pipeline Rupture at Chakachatna River Crossing, Summer

The table's title is confusing.

RFAI: Please clarify if this is for the Chakachatna River or McArthur River.

Scenario 2:

Table 1-12: Response Actions – Pipeline Rupture at Chakachatna River Crossing, Winter (i) Stopping Discharge at Source:

This section indicates that the remotely operated pipeline valves are shut in by the control room operator or may be manually shut in. However, the plan does not indicate if or when the remote valve closure is verified as actually closed.

RFAI: Please clarify if and when a remotely closed valve is verified as closed or confirmed closed by response personnel in the event of a remote closure failure. This would benefit from an estimate of the time it would take to determine failure of the remote operation and initiation and completion of the manual shut-in.

Table 1-12 (vii) Spill Recovery Procedures

This section indicates that TF-3 and TF-4 will recover oil with one Class 2 Contract vessel & one Class 3 Fishing vessel with a 13-30 Crucial disc skimmer. However, the CISPRI Technical Manual (CTM) lists class 2 and class 3 vessels in the Logistics and Planning tactics section separate from the equipment list for vessels in Appendix A-1.

RFAI: Request to include descriptions of all vessel classes used by CISPRI in the equipment appendix.

Table 1-12 (ix) Transfer and Storage of Recovered Oil/Water; Volume Estimating Procedure

This section does not address how oil ice mixtures will be managed or how oil will be separated from ice for recovered oil calculations.

RFAI: Please clarify how recovered oil and ice will be managed to accurately calculate quantities of recovered oil.

Scenario 3:

Pipeline Rupture at Subsea Cook Inlet Pipeline in Summer

Table 1-16 Scenario Conditions-Pipeline Rupture at Subsea Cook Inlet Pipeline in Summer Conditions

This table references Figure 1-6, however this figure does not exist in the table of contents. It appears that Figure 1-5 is the correct figure though it's not included in the redline pages, it does however appear in the entire plan. Likewise, the page referenced for the table listed (1-5 Pipeline Rupture Scenario at Subsea Pipeline) does not contain the referenced Figure 1-5.

RFAI: Please update figure references in plan.

Scenario 4:

Pipeline Rupture at Subsea Cook Inlet Pipeline in Winter

Table 1-21 Scenario Conditions-Pipeline Rupture at Subsea Cook Inlet Pipeline in Winter - Scenario Conditions

This table references Figure 1-6, however this figure does not exist in the table of contents. It appears that Figure 1-5 is the correct figure though it's not included in the redline pages, it does however appear in the entire plan. Likewise, the page referenced for the table listed (1-5 Pipeline Rupture Scenario at Subsea Pipeline) does not contain the referenced Figure 1-5.

RFAI: Please update figure references in plan.

Table 1-22 (Continued) –Pipeline Rupture at Subsea Cook Inlet Pipeline in Winter-Response Strategy

(vii) Spill Recovery Procedures

This section indicates the use of one Class 2 Contract vessel and one Class 3 Fishing vessel. However, the CISPRI Technical Manual (CTM) lists class 2 and class 3 vessels in the Logistics and Planning tactics section separate from the equipment list for vessels in Appendix A-1.

Additionally this section indicates that by hour 24, TF-4 is established near tidal rips to recover any oily debris in the rips. However, just as oily debris will collect in tidal rips, so will oiled ice. This section does not indicate how oiled ice will be managed.

RFAI: Request to include descriptions of all vessel classes used by CISPRI in the equipment appendix. Additionally, please clarify how oiled ice that has collected in tidal rips will be managed.

Table 1-22 (Continued) –Pipeline Rupture at Subsea Cook Inlet Pipeline in Winter-Response Strategy

(ix) Transfer and Storage of Recovered Oil/Water; Volume Estimating Procedure

This section does not address how oil and ice mixtures will be managed or how oil will be separated from ice for recovered oil calculations.

RFAI: Please clarify how recovered oil and ice will be managed to accurately calculate quantities of recovered oil.

PART 2. PREVENTION PLAN

2.1 PREVENTION, INSPECTION AND MAINTENANCE PROGRAMS

2.1.1 Oil Discharge Prevention Training Program [18 AAC 75.020]

This section indicates that spill prevention training records will only be maintained, "as long as the individual is assigned duties involving inspection, maintenance, or operation of oil storage, transfer, or transportation equipment" and that "training records are retrievable upon regulatory agency request," instead of retaining the records for 5 years as required at 18 AAC 75.020(e).

RFAI: Please explain the justification for removal of the 5-year retention requirement and clarify how this meets the requirements of 18 AAC 75.020.

2.4 CONDITIONS INCREASING RISK OF DISCHARGE

2.4.2 SUBSEA HAZARDS

This sub-section indicates that in the event sections of underwater pipeline are determined to be unsupported due to bottom scouring or erosion, Harvest will utilize divers to inspect and stabilize the spans using sea-crete. Maintaining a record of areas that have required stabilization would aid in establishing trends and determining known "trouble spots" along the sub-sea pipeline.

RFAI: Much like maintaining a discharge history, please clarify if a historical record of subsea stabilization issues and mitigating measures in effect has been developed. We recommend that this information be provided as a table to aid identification of potential spill locations as required by 18 AAC 75.425(e)(2)(C).

PART 3. PREVENTION PLAN

3.2 RECEIVING ENVIRONMENT

3.2.2 ROUTES OF DISCHARGE

Under the paragraph describing the Granite Point Tank Farm, Figure A-2c is mentioned when discussing route of discharge though this figure is not included in the plan.

RFAI: Please include Figure A-2c in plan as referenced.

Under the paragraph describing the Trading Bay Pump Station, Figure A-3b is mentioned when discussing route of discharge/presence of retention pits though this figure is not included in the plan.

RFAI: Please include Figure A-3b in plan as referenced.

3.4 RMROL

3.4.4 ICE AND DEBRIS

Under the "ON LAND" section, paragraph 2 indicates that, "CISPRI and Harvest skimmers and other pumping systems can penetrate ice and debris," and further indicates that, "Limitations [due to ice] might be significant due to the fact that skimming and fuel-recovery systems would have a difficult time reaching the spill due to ice." It is unclear how existing skimmers will "penetrate ice and debris" and the later statement seems to conflict with the former.

RFAI: Please clarify how existing skimmers will penetrate ice and debris and whether these resources can reach the impacted area and be brought to bear on the spill in the presence of significant ice conditions as described.

3.10 PROTECTION OF ENVIRONMENTALLY SENSITIVE AREAS

The first paragraph on page 3-17 indicates that seasonal data on species present is available in NOAA ESI maps but there is no further reference to which maps cover the plan area. While these maps can be found and downloaded from NOAA's website and may very well be available to pipeline personnel and responders during an incident, the specific ESI maps relevant to the area should at least be listed in the plan so they can be readily looked up and referred to during a response or included as an appendix in the plan.

RFAI: Strongly recommend providing ESI maps or a quick reference list in the plan to meet the intent of 18 AAC 75.425(e)(3)(J)(i). We further recommend the inclusion of a link to the Cook Inlet Response Tool (CIRT) where Cook Inlet ESI maps may be accessed.

PART 5. RESPONSE PLANNING STANDARDS

5.1 CRUDE OIL TRANSMISSION PIPELINE RPS

CIRCAC understands that the RPS reduction in volumetric spill volumes was due to both platform production and pipeline flow changes as well as improved accuracy of the topographic mapping. The new USGS Digital Elevation Mode Mapping efforts show additional low spots in the pipeline which reduce the worst-case drain down volume. With that said, and while we believe this survey is accurate, we want to ensure that every effort has been made by State of Alaska pipeline engineers to validate the drain down volume and rate.

RFAI: Please consider reviewing and recalculating these findings to ensure that the RPS volume, and resultant adjustments to personnel and resources and timelines are sufficient to respond to potential pipeline incidents as outlined in each scenario.