



Comments and Requests for Additional Information

Regarding

Harvest Alaska, LLC

Cook Inlet

Oil Discharge Prevention and Contingency Plan

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

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Overview

Throughout the plan there is a mix of spelled out words or phrases and acronyms. At first it appeared that there was a renewed preference to use acronyms (because there is a list of acronyms and abbreviations) with spelled out words and phrases being replaced. But there also seems to be places where the acronym has been deleted and the spelled-out word or phrase inserted, and instances where the word or phrase is spelled with the acronym provided after (e.g., State and Federal On-Scene Coordinators (SOSC/FOSC); AWA Arctic and Western ACP; Right of Way (ROW); Environmental Unit Leader (EUL)).

Additionally, the Arctic and Western Alaska ACP is shown as Arctic and Western ACP while the Alaska Inland ACP is shown with the correct title.

RFAI: Recommend using one method throughout the plan to provide consistency. Recommend using the correct title for each Area Contingency Plan cited.

Introduction

This plan revision contains an updated version of the contractual terms of agreement with CISPRI but no date or signatures are provided. Recognizing that this is a redline version and that signatories have not yet finalized the agreement, CIRCAC must still point out this irregularity.

RFAI: Please ensure a signed copy of this document appears in the approved final version of this ODPCP.

PART 1 - RESPONSE ACTION PLAN

1.1 EMERGENCY ACTION CHECKLIST

This check list contains helpful information for responders and incident managers. However, the portion identifying the First Person to Sight Spill could be improved by adding other questions regarding safety, i.e. secure sources of ignition, other personnel safety hazards as a result of any causal factors.

The Kenai Operations Foreman portion addresses some of these safety items, however regarding personnel injuries the Foreman is only prompted to ensure personnel safety.

RFAI: Recommend adding to the First Person to Sight Spill portion, "Can all sources of ignition be safely secured? If so, have they been secured?" and "Have any facility personnel been injured as a result of the discharge?" Recommend that the Kenai Operations Foreman verify "Any personnel injured? How many? If so, initiate appropriate safe care and transportation for injured personnel" and "Verify electrical power and all sources of ignition have been secured."

Figure 1-3: Spill Report Form

This comprehensive form collects much useful data regarding details of the spill or release. However, it is difficult to determine if the version provided is a product of redline changes or actually a two-page form. That said, some of the information appears to be redundant and somewhat unclear. For instance, Facility name, date, time of spill, and material released or product spilled along with other spill details are asked twice. This seems redundant and unnecessary. Likewise, the first page asks “Company” while the second page asks “Contract company (if Applicable)”? One seems more pertinent than the other.

RFAI: Recommend a review of the information on the Spill Report Form to reduce redundancies and to improve clarification to ensure the best, most pertinent data for responders, planners, and incident documentation is collected.

1.2 REPORTING AND NOTIFICATION

1.2.3 Qualified Individual

This section first identifies an “EHS representative” then deletes the term in two other places in the plan. Then in 1.6.2, the term “EHS Specialist” is used for the first time in section 1.6.2 and then again as a position title in the Prevention Training table in section 2.1.1. Nowhere within the plan is this position described i.e. as others are in section 2.1.1, nor is there an indication of who will fill this position or what their qualifications are or should be.

RFAI: Please clarify which title should be used, what the duties are of the EHS representative/specialist, and who will fill this roll.

Table 1.1 – ICS Personnel and Telephone Numbers, ICS and QIs for All Incidents is included in this section though Table 1-2 precedes it in Section 1.2.2.

RFAI: Please ensure this and all tables are correctly numbered and placed within the plan accordingly and in sequence.

1.3 SAFETY

1.3.5 Evacuation Routes and Plans

This section discusses primary and secondary evacuation routes and modes of transport from various facilities. It cites reference to Figures A-2d and A-3c in Appendix A for muster areas, and evacuation routes and evacuation craft locations. However, the Table of Content reveals that Figure A-3c does not exist. Likewise, this section mentions Swanson River Field and its evacuation routes yet no site map showing evacuation routes is provided in the plan.

RFAI: Recommend verifying correct Appendix numbering and inclusion of site map for Swanson River Field evacuation Routes.

1.5 DEPLOYMENT STRATEGIES

1.5.2 Transport Resources

This section discusses various facilities and the transportation assets at each to be used in the event of a spill. The section states that the Offshore Services Kenai (OSK) dock, located in Nikiski Bay, is also available for marine operations in Cook Inlet and is staffed to support 24-hour operations in [sic] needed. This facility could be staffed to support 24-hour operations but it is not known to be staffed for 24-hour operations at this time.

RFAI: Request Offshore Services Kenai (OSK) dock status be verified and more precise language be used to describe operations from that facility. Also, the statement includes a syntax error.

1.5.3 Transportation Equipment and Personnel in Adverse Weather

The first paragraph in this section includes, "the west side of Cook Inlet" though this verbiage is deleted in 1.5.2 even though the same table (Table 1-4) is referenced.

RFAI: Recommend a review and update of the information in both of these sections, and elsewhere in the plan to ensure all information is accurate and correct.

1.6 RESPONSE ACTIONS AND STRATEGIES

1.6.6 Wildlife Protection

The last paragraph in this section indicates, "The ASLC is ready to rehabilitate sea otters, pinnipeds, and two small cetaceans..." It is unclear if the word "two" is used correctly.

RFAI: Please clarify how many and what species of cetaceans the ASLC can rehabilitate at any time.

Table 1-7: Response Actions – Pipeline Rupture at McArthur River Crossing, Summer

(vii) Spill Recovery Procedures

This section identifies task force operations by Task Force 5 (TF-5): Open Water Recovery. The section states that by hour 5, TF-5 provides containment and recovery on the open water. TF-5 will recover oil using a CISPRI Class 1 vessel, a Crucial 13-30 skimmer, and 2,500 bbl of onboard storage. It goes on to say that at hour 10, TF-5 will recover oil using a CISPRI Class 1 contract vessel, a Crucial 13-30 disc skimmer, and 1,236 bbl of onboard storage. It is not clear here if there is a second class 1 vessel that joins TF-5 at hour 10 or if it is the same vessel.

RFAI: Please clarify how many vessels are operating at hour 10.

Table 1-27 Swanson River Oil Pipeline Rupture Summer – Response Strategy

(vi) Spill Containment and Control Actions

This section discusses responders and equipment arriving by road to the spill site and by helicopter and/or road downstream from the spill site, referencing figures 1-11 and

1-12. However, the Table of Contents does not list these tables nor could they be found within the content of the plan.

RFAI: Please clarify where the information referenced may be found.

1.7 NONMECHANICAL RESPONSE OPTIONS

1.7.1 In Situ Burning

This section discusses the instances when In-situ burning may be considered and the process to initiate this response tactic. The section references Appendix IV of the Regional Contingency Plan (RCP) as the location for an Application and Burn Plan form it also provides a live link to the form. The link worked well. However, the location cited (Appendix IV of the RCP), was not accurate. Appendix IV of the RCP contains Wildlife Protection Guidelines for Oil Spill Response in Alaska.

RFAI: Recommend including the most correct location for an Application and Burn Plan form. Likewise, for additional operational conditions to be considered when planning to burn oil in situ.

1.7.2 Dispersants

It is a given that dispersant use may not be the best choice for oil spill response in Cook Inlet. Nonetheless, this section provides relatively little information or guidance beyond referencing Alaska Regional Response Team approval and additional detail (tactics) within the CISPRI Technical Manual. Unlike the in situ burning section where a considerable amount of discussion and information has been deleted in favor of referencing the location of the Guidelines in the RCP, this section does not nor did it previously have much to offer. This section should contain enough discussion and guidance, either directly or by reference, to provide the Incident Commander with enough information to make a well-informed decision.

RFAI: Recommend including ample discussion and more reference guidance to best inform the Incident Commander.

PART 2 - PREVENTION, INSPECTION AND MAINTENANCE PROGRAMS

2.1 DISCHARGE PREVENTION PROGRAMS

2.1.1 Oil Discharge Prevention Training Programs

In the Prevention Training Table, it is unclear why Spill Reporting training was removed.

RFAI: Please clarify why this particular training was discontinued/removed.

2.1.2 Substance Abuse Programs

In this latest plan renewal, this section now indicates that, " *Harvest Alaska is not participating in any medical monitoring programs. Our operators do not perform work in areas that meet the requirements for Medical Surveillance Programs.*" It is unclear why this statement was added or what changed operationally to eliminate the need for Harvest Alaska to meet the requirements of 18 AAC 75.007(e).

RFAI: Please clarify why this statement was added and the rationale for it.

PART 3 – SUPPLEMENTAL INFORMATION

3.4 REALISTIC MAXIMUM RESPONSE OPERATING LIMITATIONS

3.4.2 Adverse Weather Conditions - Temperature

In the first paragraph of this section, a new sentence has been added that indicates, " *To reduce or prevent equipment from failing during cold weather, additional heat would be applied to the equipment during spill response.*" While this makes sense, there is no additional information provided that indicates how this will be accomplished and with what equipment. Nor does the CISPRI TM indicate how this will be accomplished. The CISPRI TM does include information indicating that at least one kerosene construction heater is available at Swanson River equipment cache (Table 15 in Logistics and Planning section 4-6). No information is provided to indicate whether this heater would be used in this capacity.

RFAI: Please clarify how heat will be applied to equipment to prevent equipment failure in cold weather.