"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."

January 16, 2015

Gary Evans
Industry Preparedness Program
Alaska Department of Environmental Conservation
555 Cordova Street
Anchorage, AK 99501

SUBJECT: Requests for Additional Information on Kenai Pipeline Company Oil Discharge Prevention and Contingency Plan (No. 10-CP-2083)

Dear Mr. Evans:

Cook Inlet Regional Citizens Advisory Council (RCAC) submits the following Requests for Additional Information on the Kenai Pipeline Company Oil Discharge Prevention and Contingency Plan (No. 10-CP-2083) on behalf of our member entities. Our mission is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet.

Cook Inlet RCAC found the plan to be well-written and clear. In our enclosed review, we provide both priority requests and several suggested changes to further enhance the overall quality and usefulness of the plan. Our priority requests are that:

- The State provide the CISPRI Technical Manual for public review.
- The scenarios refer to specific equipment and personnel resources, estimate the quantity of oil recovered, and identify specific potentially affected environmentally sensitive areas.
- A scenario be included that assumes that oil will be released to Cook Inlet waters.
- The material and general quality of the tertiary containment area be clarified.

As always, 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. We request that a findings document be provided at the conclusion of this review.

Sincerely,

Michael Munger
Executive Director

Cc: Graham Wood

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Comments and Requests for Additional Information

Regarding

Tesoro
Kenai Pipe Line Company
Oil Discharge Prevention and Contingency Plan
(10-CP-2083)

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

JANUARY 16, 2015

General Comments

The Kenai Pipe Line Company Oil Discharge Prevention and Contingency Plan (ODPCP or C-plan) is generally very clear and well organized. In our review, the Cook Inlet Regional Citizens Advisory Council (RCAC) provides both priority requests and several suggested changes to further enhance the overall quality and usefulness of the plan. In this case, our priority requests are that:

- The State provide the CISPRI Technical Manual for public review.
- The scenarios refer to specific equipment and personnel resources, estimate the quantity of oil recovered, and identify specific potentially affected environmentally sensitive areas.
- A scenario be included that assumes that oil will be released to Cook Inlet waters.
- The material and general quality of the tertiary containment area be clarified.

As is the case with other Tesoro C-plans and Cook Inlet C-plans in general, this plan heavily references CISPRI Technical Manual. We reiterate our request made in our [October 16, 2014] request for additional information on the Tesoro Vessel Plan that the CISPRI Technical Manual should be provided for review. Many sections of this plan refer to the Manual only, i.e., the deployment of response resources including any potential impacts of inclement weather which is required at 18 AAC 75.425(3)(1)(E) but is impossible to evaluate since it refers only to the CISPRI Technical Manual. In particular, the scenarios are difficult to evaluate as specific quantities of equipment and personnel are not described in the plan but only identified in CISPRI tactics that are incorporated by reference.

We also suggest that a thorough proofread and review for readability (font size) should be completed prior to plan finalization.

1. Response Action Plan

1.1 Emergency Action Checklists

This section provides checklists of actions to be taken by the different parties in the event of an emergency. Clarity could be improved by including the following details:

- Section 1.1 indicates that after attending to their own safety all emergencies or oil or hazardous material releases, an employee will notify the tank farm control center operator of any emergency. However, Table 1.1-1 First Responder indicates contact with the "appropriate operational control room." Please clarify who should be notified and whether this is always the Tank Farm Control Room.
- Figure 1.1-1 Response Procedures Flowchart indicates security measures to be implemented as part of the sustained response actions. We recommend that the C-plan note the implementation of security measures immediately as part of the site control.

1.2 Reporting and Notification

This section describes the reporting and notification procedures in the event of an oil spill. We recommend including the following minor changes:

- The State Pipeline Coordinator's Office phone number is incorrectly listed in Table 1.2-1 Spill Reporting Sequence as a 24-hour number; should be replaced with office hours. (This number is also mentioned in Table 1.2-5.)
- Table 1.2-3 Oil Spill Discharge Information table does a good job capturing information required for a comprehensive report. Please clarify how reported material could be confidential as listed in Reporting Party Information.
- Table 1.2-3, we recommend clarifying that the "Quantity" column refers to the quantity of material discharged to water since the total quantity discharged is already noted.

1.3 Safety

The first paragraph indicates that trained operators will use SCBAs or organic vapor respirators (dependent on air monitoring results), and explosion meters to determine and mark the area of any explosive cloud coming from a spill so that safe limits can be determined. We recommend clarifying to reflect best safety practices for site characterization, e.g. SCBA will be used exclusively until air monitoring determines that O2 levels are adequate, and that LEL and H2S levels are within acceptable ranges.

1.3.5 Characterization of Response Site

Recommend changing order of procedures; Hot, Warm and Cold Zones cannot be established until after the site has been characterized and delineated. Then zones and entry points (primary and secondary) can be established. Additionally recommend establishing security around Cold Zone to protect personnel and equipment in and around Warm and Hot zones from entry by unauthorized personnel as well as for public safety.

Bullet point six indicates Level "A" or "B" requires buddy system in the Hot Zone. Please clarify if Tesoro has Level "A" PPE and if personnel are trained in its use, as CISPRI personnel are not.

Bullet point seven indicates the Warm Zone on water borne operations may be on the deck of the support vessel, with the Hot Zone on one side of the vessel and the Cold Zone on the other side. Recommend following the site control onboard typical contract vessels used for response as indicated in the CISPRI Technical Manual which designates the aft (working area of the deck space) portion of the vessel as the Hot Zone, the next area forward on the vessel as the Warm Zone, and the cabin or superstructure of the vessel to the bow area as the Cold Zone.

1.3.8 Decontamination

This section indicates that the Decontamination site will include a wash tub, a rinse tub and a change area. The CISPRI Technical manual describes both dry and wet decon. If full wet decontamination is to be used, considerations for liquid waste should be identified. Please clarify how contaminated liquids would be dealt with from equipment decontamination.

1.4 Communications

This section indicates marine VHF channels 10 and 16 would be used for initial communications then once an emergency was established communications would switch to the safety or emergency channel 5. Please clarify whether channel 5 is a marine VHF channel or a Tesoro assigned frequency.

1.5 Deployment Strategies

The deployment strategies reference two tactics in the CISPRI Technical Manual: CI-LP-1A and B. Please use this information to indicate how long it would take various key assets to reach the specific, stationary facilities covered in this C-plan and identify, as required by 18 AAC 75.425(e)(1)(E), how inclement weather or other conditions may impact response mobilization and deployment and what alternatives are available.

This section indicates that the Tesoro Incident Commander or his (her) designee will delegate the Tesoro Liaison Officer to report the spill to the appropriate Federal, State, Borough, or other public and private officials. However, Section 1.2 indicates that the QI will make these notifications. Please clarify who will make these notifications and ensure consistency throughout the plan.

1.6 Spill Response Strategies

Both scenarios rely heavily on referencing tactics in the CISPRI Technical Manual. As noted above, this makes evaluation of the scenarios very challenging as they lack detail regarding the specific locations considered and quantity and type of equipment that will be used. In addition, neither scenario includes an estimate of the amount of oil recovered as required at 18 AAC 75.425(e)(1)(F)(x). Please include this accounting based on the equipment and other resources that would be deployed.

We also suggest that a scenario should be added that demonstrates a response to a spill from the KPL dock infrastructure. Section 3.2.2 indicates that significant volumes of oil may reach Cook Inlet, warranting the demonstration of an effective response of a spill to marine waters in this plan. If this is not included, then at minimum Response Scenario #1 should be modified to assume that at least 5% of the spill volume drains to Cook Inlet.

1.6.2 Response Scenario #1 (RPS Spill from Tank Farm)

In addition to the general comment regarding the importance of specific accounting for oil recovery and the reliance on the CISPRI Technical Manual, Scenario #1 would benefit from the following:

- Demonstrate how the response would be implemented if 5% of the spill volume was released to water. (Section 3.2.2 indicates that this is possible due to drainage on the site, even if it is unlikely.) While the scenario describes having vessels and other resources for nearshore and shoreline clean-up on standby, it is reasonable that the RPS scenario should show how this would be implemented and that portion of the spill (in this case 4150 bbl) would be contained, controlled, and cleaned up within 72 hours.
- The scenario assumes that the spilled oil stays within the tertiary containment area, and indicates that (one) handheld IR camera will be used for tracking and surveillance and that CISPRI tactics will be implemented. However, it is implied that responders implementing other activities will conduct tracking and surveillance as well, which is unclear without a thorough accounting of personnel as noted above. We suggest that the personnel be accounted for to implement periodic plume delineation - particularly in the presence of snow and ice - to ensure that the tertiary containment has not been breached. (This is particularly important since the permeability of the tertiary containment area is not clear.) Surveillance in real-time is required by 18 AAC 75.425(e)(1)(F)(iv).
- The scenario notes that the Nikiski Fire Dept. will be asked to respond as far as the refinery gate. Please clarify to which facility the Department will be asked to respond.
- The Operations Section should plan for nighttime operations during the 0930 - 1200 operational period rather than 1800-0600. Much of this response will take place during darkness since it takes place in December.
- Table 1.6-3 Scenario Strategy - Day One lists ADEC requirements under 18 AAC 75.425. The table portrays the timeline in a 24 hour shift cycle, however the day one shift cycle started (according to the response scenario) later in the morning sometime after the spill occurred. Additionally Table 1.6-2 Tactical Objectives for Day-1 indicates the work period started at 0930 (a realistic start time based on spill occurrence at 0800). The day one work period for each of these tables should reflect the same start times to avoid confusion. We recommend adjusting start times for continuity.
- Also in Table 1.6-3, section "(x) Plans, Procedures and Locations for Temporary Storage and Disposal" indicates the establishment of portable tankage at KPL to offload recovered product, but does not indicate a specific location. Section (ix) indicates that recovered product is being cycled through fast tanks to tank trucks to Marathon LACT unit. (Previously in the recovered product/waste management section, it is indicated that two 100 X 150 bermed, lined containment cells would be constructed in the lower KPL staging area for temporary waste management. Please

clarify the differences between these temporary storage devices and units. We recommend incorporating all three in this section.

- In Table 1.6-6 Scenario Strategy - Day Two, the description of "Plans, Procedures and Locations for Temporary Storage and Disposal" notes the proper segregation of waste per the Waste Management Plan. Proper handling of waste should start as soon as waste is generated to minimize handling and to ensure that waste streams are not mixed. We recommend including the segregation of waste in Table 1.6-3 Scenario Strategy - Day One as well.
- The strategies for Environmentally Sensitive Area (ESA) Protection [required at 18 AAC 75.425(e)(1)(F)(v)] indicate that resources will be on standby; however, it does not appear that any equipment is actually deployed for ESA protection. For a spill of this magnitude, some sort of protective action would likely be utilized as early as possible, at GRS locations and other sensitive areas. Cook Inlet RCAC requests that the scenario be revised to clarify whether and when such deployment occurs, and to show that the specific equipment required is available and mobilized to the scene in order to accomplish the objectives [as required by 18 AAC 75.445(d)(4)].

1.6.3 Scenario #2

Similar to the comments for Scenario #1, this scenario should include the specific equipment and personnel resources that would be deployed and accounting for the quantity of oil recovered. Recommend referencing Section 3.2.1 to show how potential impacts to ground will be assessed and including other text to address site-specific sensitive area concerns.

2.0 Prevention Plan

2.1. Prevention Programs in Place

2.1.2 Substance Abuse Programs

This section essentially reiterates regulatory language [18 AAC 75.007(e)] by stating that certain personnel will be free of substance abuse or medical problems, but does not specify how the policy will be implemented. Recommend including an explanation of how this is accomplished. e.g. random urine analysis, annual medical monitor physicals, etc. This is particularly important because a prevention credit against the RPS is awarded for having a substance abuse prevention program in place.

2.2 Discharge History

The discharge history does not include a roughly 1200 bbl spill from a frozen ballast water line that occurred in the early 1990s. Please add this spill.

2.3 Potential Discharge Analysis

2.3.2 Storage Tanks

This section cites maximum receiving rate at 30,000 bph and that a significant tank overflow would be 5,000 bbl if it took 12 minutes to discover the spill and shutdown pumps. We recommend recalculating the release amount.

This section also states that tank spills have occurred as a result of seismic events. Please note these in the discharge history (Section 2.2).

2.3.3 Facility Piping

This section cites a normal flow through rate of 15,000 pph with a maximum rated capacity of 30,000 bph. At 30,000 bph with 10 minutes of run time, 5,000 bbls would be released. We recommend recalculating the release amounts included in the plan.

2.3.4 Potential Dock Operations Spill Volumes

This section mentions the potential for a spill from the KPL dock and cites a history of spills of 10 gallons or less, Table 2.2-1 contains at least two spills associated with dock operations that range between 75 gallons and 2 bbls. Additionally this section does not identify a potential spill volume as required at 18 AAC 75.425(e)(2)(C).

3.0 Supplemental Information

3.1 Facility Description and Operational Overview

3.1.1 KPL General Facility

The description of the marine terminal is a good overview of this part of the facility and does include a description of the hoses used to transfer products to and from vessels. However the overview does not include a description of the pipelines servicing the pier. This is an important detail to include as the pier is serviced by several pipelines of various sizes ranging from 14" to 24" and extend 0.3 miles from the pump house located on shore near the beginning of the causeway to the end of the marine terminal. We recommend including these facility details.

3.3 Incident Command

This section describes the overall incident command system. We request that Cook Inlet RCAC appear in the organization chart provided in Figure 3.3-1 lateral to the Liaison Officer along with other stakeholders; consistent with both the Unified Plan and Cook Inlet Subarea Plan.

3.4 Realistic Maximum Response Operating Limits

This section relies entirely on the CISPRI Technical Manual. This reference should be elaborated upon to include site-specific information regarding potential adverse conditions that may be encountered at the facility and mitigating measures to be taken as required at 18 AAC 75.425(e)(3)(D).

3.5 Logistics

This section relies entirely on the CISPRI Technical Manual. This reference should be elaborated upon to include site-specific information regarding how specific equipment will be transported to the facility as required in 18 AAC 75.425(e)(3)(E).

3.6 Response Equipment

This section relies entirely on the CISPRI Technical Manual. This reference should be elaborated upon to specify equipment that is Tesoro's (including storage, maintenance, and testing) and not CISPRI's, and identify the time it would take to deliver offsite resources to the facility as required at 18 AAC 75.425(e)(3)(F).

3.7 Non-mechanical Response

This section presents an overview of the non-mechanical response options and the process to seek approval. The C-plan states that; "It is Tesoro's intent to pursue any non-mechanical option that can be mutually agreed upon by Federal and State agencies to respond to an oil spill." Please clarify by stating explicitly that non-mechanical response methods are intended for use only when mechanical recovery is not a viable response option.

3.10 Protection of Environmentally Sensitive Areas

This section contains excellent references. In addition, we suggest that the Cook Inlet Response Tool should be included in the C-plan as an additional valuable reference for any spills occurring on, or near, Cook Inlet. The tool can be found at: http://portal.aoos.org/cirt.php.

The plan does not identify specific sensitive areas vulnerable to spill impacts from the Tesoro facilities and identify specific strategies for protecting these sensitive areas, such as specific GRS sites and other protection priorities. While the C-plan does not represent a guarantee that certain areas would be protected, this plan covers stationary facilities and it is reasonable to identify sites that would be likely priorities. [18 AAC 75.425(e)(1)(F)(v)]

5.0 Response Planning Standard

5.1.1 Oil Terminal Facility

We request that the tertiary containment area be described in further detail to justify the prevention credit awarded.

In addition, the RPS listed is different than the number resulting from the calculations shown. Please clarify.

5.1.2 Crude Oil Pipeline

The final RPS shown appears to be correct, but we suggest checking the calculations related to the 5% credit for leak detection.

5.2 Summary Of Discharge Estimates

This section identifies Table 5-1 as providing a summary of the potential discharge volumes from the facility. However the section is titled 5.2 and table included in this section is titled Table 5.3-1. Additionally it is difficult to determine where the values listed in the table are derived. Please clarify numbering of the table and the source for the values listed in the table.

5.3 USCG Worst Case Discharge Response Planning Standards

This section provides only the Totals for the WCD, MMPD, and AMPD. However the calculations used (based on the 33 CFR 154 requirements) are not provided as was provided for the EPA and State of Alaska RPS calculation. Recommend providing the 33 CFR 154 equation and the appropriate values.