

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

October 16, 2014

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Kodiak Island Borough

Kenai Peninsula Borough

Municipality of Anchorage

John Kotula
Industry Preparedness Program
Alaska Department of Environmental Conservation
P.O. Box 1709
Valdez, AK 99686

SUBJECT: Requests for Additional Information on Tesoro Oil Discharge Prevention and Contingency Plan for Cook Inlet Vessel Operations, Plan No. FRP-CP-2039

Dear Mr. Kotula:

Cook Inlet Regional Citizens Advisory Council (Cook Inlet RCAC) submits the following Requests for Additional Information (RFAI) on the Tesoro Oil Discharge Prevention and Contingency Plan (C-plan) for Cook Inlet Vessel Operations (Plan No. FRP-CP-2039) on behalf of our member entities. The mission of the Cook Inlet RCAC is to represent the citizens of Cook Inlet in promoting environmentally safe marine transportation and oil facility operations in Cook Inlet.

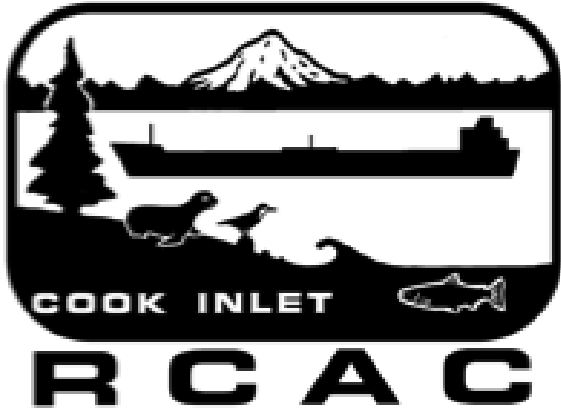
Cook Inlet RCAC found the C-plan to be well-written and clear. Our primary suggestion is that the CISPRI Technical Manual, which is heavily referenced throughout this plan, should be provided for review. While CISPRI does an excellent job of being prepared for spill responses in Cook Inlet, and their Technical Manual is frequently referenced in operator plans, this plan is particularly critical to determining the level of capacity in terms of vessels, equipment, and personnel that are available for a response here. Many sections of this plan refer to the Manual only, and without this information it is difficult to truly understand the extent to which the C-plan meets the regulatory intent of 18 AAC 75.

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 MikeMunger@circac.org. We request that a findings document be provided at the conclusion of this review.

Sincerely,

FOR
Michael Munger
Executive Director

Cc: Graham Wood
Kristin Ryan



Comments and Requests for Additional Information

Regarding

Tesoro

Cook Inlet Vessel Operations

Oil Discharge Prevention and Contingency Plan

(FRP-CP-2039)

Submitted

By

COOK INLET REGIONAL CITIZENS ADVISORY COUNCIL

OCTOBER 16, 2014

General Comments

The Tesoro Vessel Cook Inlet Area Operations Oil Discharge Prevention and Contingency Plan (ODPCP or C-plan) was well-written and thorough. Tesoro operates multiple vessels in Cook Inlet, Alaska including several spot charter vessels. This contingency plan review was performed for a plan renewal, therefore, all sections of the plan were reviewed.

Overall, we strongly suggest that the CISPRI Technical Manual, which is heavily referenced throughout this plan, should be provided for review. While CISPRI does an excellent job of being prepared for spill responses in Cook Inlet, and their Technical Manual is frequently referenced in operator plans, Tesoro's vessel plan is integral to determining the level of capacity in terms of numbers of both resources and people that are available for a response in Cook Inlet. 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 (Tesoro deployment is noted but consist entirely of steps related to prompt notifications, overflights, and initiating an incident briefing). We suggest that this is an appropriate time for state and public review and comment on the Technical Manual.

RFAI: Please provide CISPRI's Technical Manual for review.

Introduction

This section states that Tesoro will provide the ADEC with information regarding spot charter vessels on a case-by-case basis.

RFAI: Please clarify if this is the information required by 18 AAC 75.410, including the vessel name and other details, as well as the start and end dates of its expected operations in the Inlet.

1.0 Response Action Plan

1.2 Reporting and Notification

1.2.2 External Notification Procedures

This section identifies the external notifications that would be made in the event of a spill, as required at 18 AAC 75.425(e)(1)(B)(ii). We suggest updating the contact information as follows:

- References USCG Sector Anchorage at 907-271-6777. This number was not in service on September 23, 2014; please verify this is the correct number.
- For the U.S. Fish & Wildlife Service, the number for the Regional Directors Office is provided; we suggest providing instead the 24hr number for the Service's oil spill coordinator.

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- For the Alaska Department of Fish and Game, we suggest listing the phone number for the Anchorage Habitat & Restoration Office before the Commissioner's office in Juneau.
 - The reference to the Minerals Management Service should be updated and the contact information verified.

RFAI: Please update contact information in plan to include current phone numbers as listed above.

1.5 Deployment Strategies

This section describes activation of command and response personnel. Under 18 AAC 75.425(i) it is required to list the initial response actions, procedures for transporting personnel and (ii) interim actions until primary responders arrive on-scene. As noted above, this section of the plan relies on the CISPRI Technical Manual for these details and that document is not included as part of the plan review.

RFAI: Please include specific deployment and initial response actions, procedures for transporting personnel and the interim actions that would be taken by personnel until primary responders arrive on-scene.

1.6 Response Strategies

1.6.1 Response Scenario #1 – 210,000 bbl Scenario

This scenario is intended to demonstrate the ability of the planholders to meet the required response planning standard, and it technically does so in terms of the volume of oil spilled and recovered based on the assumptions described. However, this scenario is a poor indication of how a response could proceed for most of the Inlet south of Nikiski since the hypothetical scenario takes place beginning first thing in the morning with very favorable conditions right next to the dock, and significant storage capacity is conveniently immediately on hand.

RFAI: In the spirit of the intent of the response planning standard regulations, we suggest that a more challenging scenario would more appropriately demonstrate the planholders' ability to meet the logistical and practical challenges of a significant spill response away from the immediate dock area.

Scenario Assumptions

Assumption #12 states that the scenario involves an inbound cargo vessel and therefore tankage is available at the KPL facility (referred to as 300+ bbl on page 1.6-30 and as 300K bbl in Table 1.6-12). No further information is given regarding the location and availability of this potential resource, which would represent a significant storage potential.

RFAI: Please provide more information regarding this assumption including the location and specifics regarding its potential use.

Environmentally Sensitive Areas

We appreciate the reference to considering nearby Geographic Response Strategies (GRS), but suggest that the specific locations (identified either as GRS or as other environmentally

sensitive areas) which could be at risk from the spill trajectory be identified in addition to the two on Kalgin Island that are directly referenced. This is important to ensure that sufficient resources are available to implement GRS or other nearshore protection strategies in advance of the trajectory. Without these specifics, the specific resource needs cannot be evaluated. In addition, the planholder would benefit from use of the Cook Inlet Response Tool to support the identification of GRS and other environmentally sensitive areas.

RFAI: Please specify the GRS or other environmentally sensitive areas that would be prioritized in this scenario and the tactics and equipment used to implement or protect them as required at 18 AAC75.425(e)(1)(F)(v). Please specify whether the Cook Inlet Response Tool would be used.

Source Control

Regulations at 18 AAC 75.425(e)(1)(F)(i) require that actions and equipment required for source control be described. Information is given regarding contacting lightering and salvage contractors, however, source control is only broadly outlined in the text and is included the table 1.6-4; subsequent tables refer only to exploring options for lightering and stabilization; and the list of assumptions specifies that lightering will occur. There would likely be an immediate need to attempt to control the spill at the source to lessen the effects of a vessel with hull damage that has sunk in rather shallow water. Please provide more specific information on immediate source control, including actions taken and resources required. This may be further enhanced by a more descriptive scenario of what happened in this hypothetical incident.

RFAI: We recommend including more specific information on immediate actions that may be taken to control the spill at the source. Please also add additional description of the nature of the incident for the purpose of refining the description of source control actions that would be taken.

Figure 1.6-1 Tesoro Organizational Chart

This chart thoroughly identifies the response organization, however, the vessel incident command team is not integrated into the chart. Strategies cite table 1.6-1 as showing the involvement of the vessel command team (such as tank vessel safety, identifying onboard oil locations and evaluating cargo transfer opportunities). We recommend integrating the vessel command team into the Tesoro organizational chart (Figure 1.6-1).

RFAI: Please include more information on the vessel command team and their assigned relationship in the Tesoro Organization Chart. Please also review this for the other scenarios.

Table 1.6-5/1-21 Scenario One Response Equipment Mobilization Chart

This table appropriately presents the mobilization of equipment, however, the formatting requires it to be significantly magnified to it to be easily read. We recommend that the formatting be changed to increase the size of the table for ease of use. We also suggest that the table numbering be reviewed, as this table has two reference numbers in the document.

RFAI: We recommend enlarging the table and checking the reference number. Please also review formatting for similar tables presented in other scenarios, and check table numbering throughout.

1.6.2 Response Scenario #2

This scenario describes a shipboard manifold failure as the source of the scenario's spill. 18 AAC 75.425(e)(1)(F)(i) requires a description of actions taken to control the source of the spill. Table 1.6-18 (i) describes the immediate actions as securing cargo transfer, including closing all valves on the transfer vessel. Given that the spill source is coming from shore, further detail is warranted regarding the closure and checking of valves on shore as well. Please clarify all actions taken to stop the discharge at its source.

RFAI: Please clarify immediate actions taken to secure spill at the source.

1.6.3 Response Scenario #3

This scenario cites a main cargo line failure (after the vessels manifold) during a routine cargo transfer, spilling Cook Inlet crude oil into Cook Inlet. This scenario describes only one spill technician being on board the CISPRI OSRV. The presence of one technician may pose a safety problem. The vessel's crew may be trained to aid in response equipment deployment, however, their duties should remain with the operation of the vessel as required by federal regulations for manning requirement.

RFAI: Please clarify the presence of one spill technician aboard this vessel.

2.0 Prevention Plan

2.3 Potential Discharge Analysis

Table 2.3-1 lists measures taken to reduce the risk of discharge. This table includes the risk reduction measure, "Extremely low traffic density in Cook Inlet," as a measure taken to reduce risk. Please clarify how this is a measure taken by the plan holder to reduce risk.

RFAI: Please clarify the use of "extremely low traffic density in Cook Inlet" as a risk reduction measure.

3.0 Supplemental Information

We suggest that the Cook Inlet Response Tool should be included in the C-plan as a valuable reference for any spills occurring on, or near, Cook Inlet. The tool can be found at:
<http://portal.aos.org/cirt.php>.

RFAI: Please add a reference to the Cook Inlet Response Tool in Section 1.6.5 Protection of Sensitive Areas.