THE STATE of ALASKA
GOVERNOR MIKE DUNLEAVY

Department of Environmental Conservation

DIVISION OF SPILL PREVENTION AND RESPONSE
Prevention, Preparedness, and Response Program

P.O. Box 111800
Juneau, AK 99811-1800
Main: 907-465-5250
Fax: 907-465-5245
www.dec.alaska.gov

OIL DISCHARGE PREVENTION AND CONTINGENCY PLAN APPROVAL

Facility #: 1021

June 28, 2023

Mr. Henry Palmer
Delta Western, LLC
120 Mount Roberts St.
Juneau, AK 99801

Subject: Delta Western Haines **Oil Discharge Prevention and Contingency Plan, ADEC Plan #: 22-CP-1022; Plan Approval.**

Dear Mr. Palmer:

The Alaska Department of Environmental Conservation (department) has completed its review of the plan renewal application package for the Delta Western Haines Oil Discharge Prevention and Contingency Plan (plan) that was received on December 1, 2022. The department coordinated the State of Alaska's public review for compliance with 18 AAC 75, using the review procedures outlined in 18 AAC 75.455. Based on our review, the department has determined that your plan is consistent with the applicable requirements of the referenced regulations and is hereby approved.

This approval applies to the following plan:

Plan Title:	**Delta Western Haines Oil Discharge Prevention and Contingency Plan**
Documents:	**Southeast Alaska Petroleum Response Organization (SEAPRO) Technical Manual, Spill Tactics for Alaska Responders (STAR) Manual, Wildlife Protection Guidelines for Oil Spill Response in Alaska**
Plan Holder:	**Delta Western, LLC**
Covered Facilities:	**Delta Western Haines Bulk Facility**

PLAN APPROVAL: The approval for the referenced plan is hereby granted **effective June 28, 2023.** A Certificate of Approval stating that the department has approved the plan is enclosed.

EXPIRATION: This approval **expires June 27, 2028.** Following expiration, Alaska law prohibits operation of the facility until an approved plan is once again in effect.

TERMS: The approval is subject to the following terms:

1. **PROOF OF FINANCIAL RESPONSIBILITY:** The plan holder has provided the department with proof of financial responsibility per the requirements of AS 46.04.040 and 18 AAC 75.205 – 18 AAC 75.290.

2. **PUBLICATION OF PLAN:** The plan holder shall provide copies of the approved amended plan to the department in accordance with 18 AAC 75.408(c) not later than 30 days after this approval. The department will post the approved plan to the department website and notify the stakeholder listserv of the availability of the plan as described in 18 AAC 75.408(d)(3).

3. **AMENDMENT:** Except for routine updates under 18 AAC 75.415(b), an application for approval of an amendment must be submitted by the plan holder and approved by the department before a change to this plan may take effect. This is to ensure that changes to the plan do not diminish the plan holder's ability to respond to a discharge and to evaluate any additional environmental considerations that may need to be taken into account (18 AAC 75.415).

4. **RENEWAL:** To renew this plan, the plan holder must submit an application package to the department no later than 180 days prior to the expiration of this approval. This is to ensure that the submitted plan is approved before the current plan in effect expires (18 AAC 75.420).

5. **REVOCATION, SUSPENSION OR MODIFICATION**: This approval is effective only while the plan holder is in compliance with the plan as defined in AS 46.04.030(r) and with all of the terms and conditions described above. The department may, after notice and opportunity for a hearing, revoke, suspend, or require modification of the approved plan if the plan holder is not in compliance with the plan or for any other reason stated in AS 46.04.030(f). In addition, Alaska law provides that a vessel or facility that is not in compliance with a plan may not operate (AS 46.04.030). The department may terminate approval prior to the expiration date if deficiencies are identified that would adversely affect spill prevention, response or preparedness capabilities.

6. **DUTY TO RESPOND**: Notwithstanding any other provisions or requirements of this plan, a person causing or permitting the discharge of oil is required by law to immediately control, contain, and cleanup the discharge regardless of the adequacy or inadequacy of the plan (AS 46.04.020).

7. **NOTIFICATION OF NON-READINESS**: The plan holder must notify the department in writing, within 24 hours, after any significant response equipment as specified in the plan is removed from its designated storage location or becomes non-operational. This notification must provide a schedule for equipment substitution, repair, or return to service as described in 18 AAC 75.475(b).

8. **CIVIL AND CRIMINAL SANCTIONS**: Failure to comply with the plan may subject the plan holder to civil liability for damages and to civil and criminal penalties. Civil and criminal sanctions may also be imposed for any violation of AS 46.04, any regulation issued thereunder or any violation of a lawful order of the department.

9. **INSPECTIONS, DRILLS, RIGHTS TO ACCESS, AND VERIFICATION OF EQUIPMENT, SUPPLIES, AND PERSONNEL**: The department has the right to verify the ability of the plan holder to carry out the provisions of this plan and to access inventories of equipment, supplies, and personnel through such means as inspections and discharge exercises without prior notice to the plan holder. The department has the right to enter and inspect the facility in a safe manner at any reasonable time for these purposes and to otherwise ensure compliance with the plan and the terms and conditions [AS 46.04.030(e) and AS 46.04.060]. The

plan holder shall conduct exercises for the purpose of testing the adequacy of the plan and its implementation (18 AAC 75.480 and 485).

10. **FAILURE TO PERFORM:** In granting approval of the plan, the department has determined that the plan, as represented to the department by the applicant in the application package for approval, satisfies the minimum planning standards and other requirements established by applicable statutes and regulations, taking as true all information provided by the applicant. The department does not warrant to the applicant, the plan holder, or any other person or entity: (1) the accuracy or validity of the information or assurances relied upon; (2) that the plan is or will be implemented; or (3) that even full compliance and implementation with the plan will result in complete containment, control or clean-up of any given oil spill, including a spill specifically described in the planning standards. The plan holder is encouraged to take any additional precautions and obtain any additional response capability it deems appropriate to further guard against the risk of oil spills and to enhance its ability to comply with its duty under AS 46.04.020(a) to immediately contain and clean up an oil discharge.

11. **COMPLIANCE WITH APPLICABLE LAWS**: The plan holder must adhere to all applicable state statutes and regulations as they may be amended from time to time. This approval does not relieve the plan holder of the responsibility to secure other federal, state, or local approvals or permits or to comply with all other applicable laws.

12. **INFORMAL REVIEWS AND ADJUDICATORY HEARINGS**: A person authorized under a provision of 18 AAC 15 may request an informal review of a contested decision by the Division Director in accordance with 18 AAC 15.185 and an adjudicatory hearing in accordance with 18 AAC 15.195 – 18 AAC 15.340. See DEC's "Appeal a DEC Decision" web page https://dec.alaska.gov/commish/review-guidance/ for access to the required forms and guidance on the appeal process. Please provide a courtesy copy of the adjudicatory hearing request in an electronic format to the parties required to be served under 18 AAC 15.200.

    Requests must be submitted no later than the deadline specified in 18 AAC 15.

13. **NOTICE OF CHANGED RELATIONSHIP WITH RESPONSE CONTRACTOR:** Because the plan relies on the use of response contractor(s) for its implementation, the plan holder must immediately notify the department in writing of any change in the contractual relationship with the plan holder's response contractor(s), and of any event including but not limited to any breach by either party to the response contract that may excuse a response contractor from performing, that indicates a response contractor may fail or refuse to perform, or that may otherwise affect the response, prevention, or preparedness capabilities described in the approved plan.

If you have any questions regarding this process, please contact Chris Salazar at 907-465-5204 or Chris.Salazar@alaska.gov.

Sincerely,

DocuSigned by:
B926F7893D13439...
Melinda Brunner
Program Manager

Enclosures: Certificate of Approval, Number: 23CER-015
Summary of Basis for Decision

cc with enclosure:

Rachael Krajewski, ADEC
Anchorage, ADNR
Juneau, ADNR
Southeast, ADF&G
Dave Owings, SEAPRO
Alekka Fullerton, City & Borough of Haines
Sector Juneau, USCG
Bob Whittier, EPA Alaska
Environmental, NorthStar Energy
Rosie Nethercott, Integrity Environmental

Alaska Department of Environmental Conservation

Oil Discharge Prevention and Contingency Plan

Certificate of Approval

Certificate Number: **23CER-015**

Plan Number: 22-**CP-1022**

Plan Title: **Delta Western Haines Oil Discharge Prevention and Contingency Plan**

Covered Facility(s): **Delta Western Haines Bulk Facility**

Plan Holder: **Delta Western, LLC**

Address: **450 Alaskan Way South, Suite 707 Seattle WA 98104**

Telephone: **907-265-3837**

Geographic Zone(s) of Operation
(18 AAC 75.495(b)): **Southeast Alaska**

Effective Date of Approval: **June 28, 2023**

Expiration Date: **June 27, 2028**

This approval is subject to the terms and conditions of the applicable Alaska Department of Environmental Conservation contingency plan approval letter dated 6/28/2023 and continuing compliance with the requirements of AS 46.04 and 18 AAC 75.

DocuSigned by:

B926F7893D13439...

Melinda Brunner, Approving Authority
Program Manager

June 28th, 2023

Approved Plan Distribution List

Recipient	Organization	Address	City	State	Zip	Format Requested	Email
Chris Salazar	Alaska Department of Environmental Conservation	P.O. Box 111800	Juneau	AK	99801	1 Electronic; 1 Hard Copy	Chris.Salazar@alaska.gov
Rachael Krajewski	Alaska Department of Environmental Conservation	P.O. Box 111800	Juneau	AK	99801	1 Electronic	rachael.krajewski@alaska.gov
Anchorage ADNR	Alaska Department of Natural Resources	550 West 7th Avenue, Suite 1400	Anchorage	AK	99501	Electronic	dnr.cplans@alaska.gov
Juneau ADNR	Alaska Department of Natural Resources	PO Box 111020	Juneau	AK	99811	Electronic	sero@alaska.gov
Southeast ADFG	Alaska Department of Fish and Game	PO Box 110024	Douglas	AK	99811	Electronic	dfg.hab.infodou@alaska.gov
Dave Owings	SEAPRO	540 Water Street	Ketchikan	AK	99901	Electronic	gm@seapro.org
USCG	USCG Sector Juneau	709 West 9th Street	Juneau	AK	99801	Electronic	sectorjuneauIMD@uscg.mil
Robert Whittier	EPA Alaska Operations	222 West 7th Avenue #19	Anchorage	AK	99513	Electronic	whittier.robert@epa.gov
Alekka Fullerton	Haines Borough	PO Box 1209	Haines	AK	99827	Electronic	afullerton@haines.ak.us

DELTA WESTERN
HAINES BULK FACILITY

OIL DISCHARGE PREVENTION AND CONTINGENCY PLAN (CPLAN)

required by:
18 AAC 75

Operated by:
Delta Western, LLC

Plan Date: June 2023
Last Revised: Not Applicable; Plan Renewal

COVER PAGE

18 AAC 75.425(c) **The submitted plan must be accompanied by a cover page or promulgation letter that includes**

(1) the name of the plan holder, and the covered vessel, barge, railroad, facility, or operation, followed by the words "Oil Discharge Prevention and Contingency Plan";

(2) the date of the plan; and

(3) a statement, signed by an individual with appropriate authority, committing the oil discharge prevention and response resources necessary to implement the plan.

18 AAC 75.425(d)(1) **The plan must include the official plan title.**

Name of Plan Holder	Delta Western, LLC
Covered Operation	Delta Western Haines Bulk Facility P.O. Box 1369 Haines, Alaska 99827
Plan Date	June 28, 2023
Official Plan Title	**DELTA WESTERN HAINES BULK FACILITY CPLAN**

I, Henry Palmer, have the authority and commit the oil discharge prevention and response resources, identified in the Oil Discharge Prevention and Contingency Plan (CPLAN), as necessary to implement the CPLAN.

Henry Palmer
Signature

Jul 6, 2023
Date

President
Title

FRONT MATTER

PLAN CONTENTS

18 AAC 75.425(a)	**An oil discharge prevention and contingency plan submitted for approval under 18 AAC 75.400 - 18 AAC 75.495 must be in a form that is usable as a working plan for oil discharge prevention, control, containment, cleanup, and disposal. A plan must contain enough information, analyses, supporting data, and documentation to demonstrate the plan holder's ability to meet the requirements of AS 46.04.030 and 18 AAC 75.400 - 18 AAC 75.495.**
18 AAC 75.425(d)(2)	**The plan must consist of five parts and contain the information described in (e)(1) - (5) of this section.**

This CPLAN is intended to be used by Delta Western, LLC (DW) personnel for the purposes of oil discharge prevent, control, containment, cleanup, and disposal.

This CPLAN consists of five parts and contains the information described in 18 AAC 75.425(e):

PART 1 - RESPONSE ACTION PLAN

PART 2 - PREVENTION PLAN

PART 3 - SUPPLEMENTAL INFORMATION

PART 4 - BEST AVAILABLE TECHNOLOGY

PART 5 - RESPONSE PLANNING STANDARD

This CPLAN is intended to contain sufficient information, analysis, and supporting data and documentation to demonstrate DW's ability to meet the requirements of AS 46.04.030 and 18 AAC 75.400 – 18 AAC 75.495.

A table of contents is provided on page ix of this CPLAN.

NOTIFICATION OF NON-READINESS

18 AAC 75.475

(a) All spill response and other equipment identified in the approved oil discharge prevention and contingency plan or nontank vessel plan to meet the response planning standards set out at 18 AAC 75.430 - 18 AAC 75.442 must be maintained in operational condition. Any equipment found not to be operating properly must be repaired or replaced immediately.

(b) Except for a transfer approved under 18 AAC 75.470, if a significant change occurs in, or is made to, any component of a plan that would diminish the plan holder's response capability, the plan holder shall, within 24 hours, notify the department in writing and provide a schedule for a prompt return to operational status. An electronic mail or facsimile transmission delivered to the appropriate department office will be considered written notice for purposes of this subsection. If the department finds that, as a result of the change, the plan holder is no longer able to execute the plan, it will take appropriate action under 18 AAC 75.490.

(c) Notwithstanding (a) and (b) of this section, removal or inactivation of any major response item for maintenance or repair must be approved by the department before removal or inactivation. A request under this subsection must be submitted at least 10 days before the scheduled action or as soon as possible for an unanticipated repair. The request must state what substitute or temporary measures will be taken to provide equivalent response capability, reduce the time out of service, or otherwise ensure that equivalent response capability is maintained.

(d) A plan holder shall notify the department in writing within 24 hours if a significant change occurs in, or is made to, one or more of the following systems, and if, as a result of that change, the system no longer meets the applicable performance requirements;

(1) a leak detection system required by 18 AAC 75.047(d)(1);

(2) a leak detection system required by 18 AAC 75.055(a),

(3) a secondary containment system required by 18 AAC 75.075.

All listed spill response equipment will be maintained in operational condition. If any listed spill response equipment is found to be operating improperly, it will be placed out of service and repaired or replaced immediately.

DW will notify the Alaska Department of Environmental Conservation (ADEC) in writing within 24 hours:

- Of any significant change that could affect implementation of this CPLAN, including a substantial decrease in available spill response equipment or personnel and provide a schedule for the prompt return of the CPLAN to full operation status.
- If a significant change to one of the following systems occurs:
  1) leak detection
  2) secondary containment

DISTRIBUTION

18 AAC 75.455(b)(2) **When the department determines that an application package is sufficient for review, the department will (2) direct the applicant to provide copies of the application package to reviewers in accordance with 18 AAC 75.408(c);**

NAME AND ADDRESS	NUMBER OF COPIES
Delta Western, LLC P.O. Box 1369 Haines, AK 99827	1 electronic
Environmental Department, SharePoint	1 electronic
Alaska Department of Environmental Conservation P.O. Box 111800 Juneau, Alaska 99811-1800	1 electronic
Alaska Department of Fish and Game, Habitat Section P.O. Box 110024 Juneau, Alaska 99811-0024 dfg.hab.infodou@alaska.gov	1 electronic
Alaska Department of Natural Resources 550 West 7th Avenue, Suite 1400 Anchorage, AK 99501 dnr.cplans@alaska.gov	1 electronic
Alaska Department of Natural Resources, SERO P.O. Box 111020 Juneau, AK 99811 dnr.sero.spill@alaska.gov	1 electronic
SEAPRO 540 Water Street Ketchikan, AK 99901 dave@seapro.org	1 electronic
United States Coast Guard, Sector Juneau 709 West 9th Street Juneau, AK 99801 sectorjuneauIMD@uscg.mil	1 electronic

NAME AND ADDRESS	NUMBER OF COPIES
Environmental Protection Agency 222 West 7th Avenue, #19 – Room 520 Anchorage, AK 99513-7588 whittier.robert@epa.gov	1 electronic
Haines Borough P.O. Box 1209 Haines, AK 99827 afullerton@haines.ak.us, sbell@haines.ak.us	1 electronic

RECORD OF REVISIONS

This CPLAN will be amended whenever there is a change that affects the contents of this CPLAN. The type of amendment is defined in 18 ACC 75.415, and summarized below:

- Routine Plan Updates include:
  - A deletion from the list of vessels operating under the approved plan if the deleted vessel is not included as a response asset in the current response action plan under 18 AAC 75.425(e)(1); and
  - A revision to the list of names, addresses, or telephone numbers of spill command and response personnel.
- Minor Amendments include:
  - A change or revision that does not meet the definition of a Routine Plan Update (as described above) or a Major Amendment (as described below).
- Major Amendments include:
  - An increase to the response planning standard volume that exceeds the response capabilities of the plan holder documented in the plan;
  - A change that affects the response scenarios, including a change to the scenario location; receiving environment as defined in 18 AAC 75.400(i); or season of operations;
  - Expansion of the operations to include one or more new physical locations outside of the current operational area of the plan;
  - A change in the amount or quality of prevention, response resources, or training that reduces the existing level of prevention or response capabilities;
  - A change that requires an increase in prevention, response resources, or training.

The table on the following page is used to document amendments to this CPLAN. All proposed amendments to this CPLAN will be made in accordance with 18 AAC 75.415.

Revision Number	Date	Pages Affected	Changed Made	By Whom Entered
0	June 2023	Entire plan	Plan Renewal	Integrity Environmental

RECORD OF REVIEW

The table below, the record of revisions, or a stand-alone form may be used to document the completion of the annual review and evaluation of the Haines Bulk Facility CPLAN and to document whether the plan was or was not amended.

Date	Reviewed Completed By	Plan Amendment Needed?
		☐ Yes ☐ No
		☐ Yes ☐ No
		☐ Yes ☐ No
		☐ Yes ☐ No
		☐ Yes ☐ No
		☐ Yes ☐ No
		☐ Yes ☐ No
		☐ Yes ☐ No
		☐ Yes ☐ No

TABLE OF CONTENTS

18 AAC 75.425(d)(3) **The plan must contain a complete table of contents and lists of any tables or figures, with corresponding page numbers.**

The table of contents for this CPLAN is presented below.

Table of Tables

Table of Figures

CROSS REFERENCE TABLE

18 AAC 75.425(d)(4) **The plan must be presented in the order shown in (e) of this section or include a cross-reference table that directs the reader to the appropriate information.**

This CPLAN is presented in the order of the regulation however, the applicable sections of 18 AAC 75.425, 007, 025, 065, 066, 075, and 080 are listed on the following pages. Sections that are not applicable to this facility, or not applicable at this time, are also listed, but not discussed further in this CPLAN. The table is also provided as a cross reference between the applicable regulations and this Plan.

Citation	Description	Plan Section
18 AAC 75.425		
(a)	Plan content	Entire Plan
(b)	Multiple operations	Not Applicable
(c)	Cover page	Cover Page
(d)(1)	Official plan title	Cover Page
(d)(2)	Five plan parts	Plan Contents
(d)(3)	Table of contents	Table of Contents
(d)(4)	Presentation of parts/cross reference table	Cross-Ref Table
(e)(1)	Response action plan	Part 1
(e)(1)(A)	Emergency action checklist	1.1
(e)(1)(B)	Reporting and notification	1.2
(e)(1)(B)(i)	Facility personnel contact information	1.2
(e)(1)(B)(ii)	Government agency contact information	1.2
(e)(1)(C)	Safety plan	1.3
(e)(1)(D)	Communications procedures	1.4
(e)(1)(E)	Deployment strategies	1.5
(e)(1)(E)(i)	Transport procedures	1.5
(e)(1)(E)(ii)	Procedures to notify other responders	1.5
(e)(1)(F)	Response scenario	1.6
(e)(1)(F)(i)	Procedures to stop the discharge	1.6.1
(e)(1)(F)(ii)	Methods to prevent a fire hazard	1.6.2
(e)(1)(F)(iii)	Repealed 5/26/04	Not Applicable
(e)(1)(F)(iv)	Surveillance and tracking procedures	1.6.3
(e)(1)(F)(v)	Protecting environmental and concerning areas (stationary facilities)	1.6.4
(e)(1)(F)(vi)	Containing/controlling spill(s)	1.6.5
(e)(1)(F)(vii)	Recovering contained/controlled oil	1.6.6
(e)(1)(F)(viii)	Lightering, transferring, and storage of oil procedures	1.6.7
(e)(1)(F)(ix)	Recovered oil and oily water procedures	1.6.8
(e)(1)(F)(x)	Temporary storage and ultimate disposal procedures	1.6.9

Citation	Description	Plan Section
(e)(1)(F)(xi)	Protecting potentially affected wildlife	1.6.10
(e)(1)(F)(xii)	Shoreline cleanup procedures	1.6.11
(e)(1)(G)	Nonmechanical response options	1.7
(e)(1)(H)	Facility, railroad, or vessel diagram(s)	1.8
(e)(1)(I)	Response scenario for a production facility	Not Applicable
(e)(1)(I)(i)	Definition of “predominant wind directions”	Not Applicable
(e)(1)(I)(ii)	Definition of “typical summer environmental conditions”	Not Applicable
(e)(1)(I)(iii)	Definition of “typical winder environmental conditions”	Not Applicable
(e)(1)(I)(iv)	Definition of “wind rose”	Not Applicable
(e)(2)	Prevention plan	Part 2
(e)(2)(A)	Discharge prevention programs	2.1
(e)(2)(A)(i)	Oil discharge prevention training programs	2.1.1
(e)(2)(A)(ii)	Substance abuse and medical monitoring programs	2.1.2
(e)(2)(A)(iii)	Security and surveillance programs	2.1.3
(e)(2)(B)	Facility discharge history	2.2
(e)(2)(C)	Potential discharge analysis	2.3
(e)(2)(D)	Description of specific conditions	2.4
(e)(2)(D)(i)	Facility conditions that increase risk of discharge	2.4
(e)(2)(D)(ii)	Measures that reduce risk of discharge	2.4
(e)(2)(E)	Discharge detection	2.5
(e)(2)(F)	Waivers	2.6
(e)(2)(F)(i)	Copy of waiver(s)	2.6
(e)(2)(F)(ii)	Approval of waiver(s)	2.6
(e)(3)	Supplemental information	2.6
(e)(3)(A)	Facility description and operational overview	Part 3
(e)(3)(A)(i)	Overview of oil storage container(s)	3.1
(e)(3)(A)(ii)	Type and amount of oil stored in storage container(s)	3.1
(e)(3)(A)(iii)	General chart of vessel routes	Not Applicable
(e)(3)(A)(iv)	General map of railroad locations	Not Applicable
(e)(3)(A)(v)	Plans/diagrams of vessels	Not Applicable
(e)(3)(A)(vi)	General description of ship-to-ship and ship-to-shore transfers	Not Applicable
(e)(3)(A)(vii)	Description of production/processing facility flow	Not Applicable
(e)(3)(A)(viii)	Cargo stowage and disposal procedures for vessels	Not Applicable
(e)(3)(A)(ix)	Description of railroad tank cars	Not Applicable
(e)(3)(A)(x)	Other information related to vessel response capability	Not Applicable
(e)(3)(B)	Receiving environment (land-based facility)	3.2
(e)(3)(B)(i)	Diagram of potential routes of discharged oil	3.2
(e)(3)(B)(ii)	Estimation of discharge in open water	3.2
(e)(3)(C)	Command system	3.3
(e)(3)(D)	Realistic maximum response operating limitation summary	3.4
(e)(3)(D)(i)	Environmental conditions of the realistic max. response operating limitation summary: weather conditions	3.4
(e)(3)(D)(ii)	Environmental conditions of the realistic max. response operating limitation summary: water conditions	3.4
(e)(3)(D)(iii)	Environmental conditions of the realistic max. response operating limitation summary: ice and debris	3.4

Citation	Description	Plan Section
(e)(3)(D)(iv)	Environmental conditions of the realistic max. response operating limitation summary: hours of daylight	3.4
(e)(3)(D)(v)	Environmental conditions of the realistic max. response operating limitation summary: other	3.4
(e)(3)(E)	Logistical support	3.5
(e)(3)(F)	Response equipment	3.6
(e)(3)(F)(i)	Background of the response equipment	3.6.1
(e)(3)(F)(ii)	Time frame behind the response equipment (delivery and startup)	3.6.2
(e)(3)(F)(iii)	Manufacturer information and recommendations	3.6.3
(e)(3)(F)(iv)	List of vessels designated for oil recovery operations	3.6.1
(e)(3)(F)(v)	List of additional vessels available for oil recovery operations	3.6.1
(e)(3)(F)(vi)	Equipment used for transferring oil from tanks	3.6.1
(e)(3)(F)(vii)	Spill response equipment procedures	3.6.1
(e)(3)(G)	Nonmechanical response information	3.7
(e)(3)(G)(i)	Description of the specific mechanisms	Not Applicable
(e)(3)(G)(ii)	List of nonmechanical response equipment and supplies	Not Applicable
(e)(3)(G)(iii)	List of all necessary approvals	Not Applicable
(e)(3)(G)(iv)	List of all permits, approvals and/or authorizations	Not Applicable
(e)(3)(G)(v)	Plan to protect environmentally sensitive areas	Not Applicable
(e)(3)(H)	Oil spill primary response action contractor information	3.8
(e)(3)(I)	Training for discharge response personnel	3.9
(e)(3)(J)	Protection of environmentally sensitive areas and areas of the public	3.10
(e)(3)(J)(i)	The seasonal conditions of each sensitive area	3.10
(e)(3)(J)(ii)	The toxicity effects and persistence of discharge, based on the type of product	3.10
(e)(3)(J)(iii)	Areas of high priority	3.10
(e)(3)(K)	Additional information	3.11
(e)(3)(L)	Bibliography	3.12
(e)(4)	Best available technology review	Part 4
(e)(4)(A)	Identify technology applicable to the organization	Part 4
(e)(4)(A)(i)	Identify technology for contingency plans	4.1 – 4.4
(e)(4)(A)(ii)	Identify technology for a terminal	4.5 – 4.9
(e)(4)(A)(iii)	Identify technology for a tank vessel contingency plan	Not Applicable
(e)(4)(A)(iv)	Identify technology for a crude oil transmission pipeline contingency plan	Not Applicable
(e)(4)(A)(v)	Identify technology for a barge contingency plan	Not Applicable
(e)(4)(A)(vi)	Identify technology for a railroad tank car contingency plan	Not Applicable
(e)(4)(B)	Written analysis for the available technology listed in (e)(4)(A)	4.1 – 4.9
(e)(4)(C)	Best available technology justification	4.1 – 4.9
(e)(5)	Response planning standard	Part 5
(f)	Definition of technology	Not Applicable

Citation	Description	Plan Section
18 AAC 75.007		
(a)	General oil pollution prevention requirements	Not Applicable
(b)	Vessel, barge, pipeline, railroad tank car	Not Applicable
(c)	General oil pollution requirements	Not Applicable
(d)	Repealed 12/30/2006	Not Applicable
(e)	Substance abuse and medical monitoring programs	2.1.2
(f)	Security measures and surveillance programs	2.1.3
18 AAC 75.020		
(a)	Oil discharge prevention training programs	2.1.1
(b)	Training program description	2.1.1
(c)	Completion of training	2.1.1
(d)	Records of spill history	2.1.1
(e)	Training records	2.1.1
18 AAC 75.025		
(a)	Spill and overfill prevention during oil transfers	2.1.4
(b)	Boom requirements for crude oil, persistent products, and oily ballast water during vessel transfer	Not Applicable
(c)	Tank cleaning operations	2.1.4
(d)	Personnel capable of communicating orders to stop transfer	2.1.4
(e)	Positive means to stop transfer	2.1.4
(f)	Transfer procedures to/from areas not protected by secondary containment	Not Applicable
(g)	TTLR procedures	2.1.4.2
(h)	Marine oil transfer procedures	Not Applicable
18 AAC 75.065		
(a)	Field constructed aboveground oil storage tanks	2.1.5.1
(b)	FCAST inspection intervals	2.1.5.1
(c)	Onshore elevated FCAST	Not Applicable
(d)	FCAST records and documentation	2.1.5.1
(e)	FCAST repair notifications	2.1.5.1
(g)	FCAST internal lining systems	2.1.5.1
(h)	FCAST leak detection for tanks placed in service before 5/14/92	2.1.5.1
(i)	FCAST leak detection for tanks placed in service on or after 5/14/92 and before 12/30/08	Not Applicable
(j)	FCAST leak detection for tanks placed in service after 12/30/08	Not Applicable
(k)	FCAST high level alarms	2.1.5.1
(l)	FCAST overfill protection	2.1.5.1
(m)	FCAST cathodic protection system	Not Applicable
(n)	FCAST cathodic protection system	Not Applicable
(o)	FCAST out of service tanks	2.1.5.1
18 AAC 75.066		
(a)	Shop fabricated oil storage tanks	2.1.5.2
(b)	Shop fabricated oil storage tanks	2.1.5.2
(c)	Vaulted SFASTs	Not Applicable
(d)	Self-diked SFASTs	Not Applicable

Citation	Description	Plan Section
(e)	Double-walled SFASTs	Not Applicable
(f)	SFAST maintenance and inspection	2.1.5.2
(g)	SFAST discharge prevention device	2.1.5.2
(h)	SFAST testing discharge prevention devices	2.1.5.2
18 AAC 75.075		
(a)	Secondary containment areas	2.1.6
(b)	Offshore exploration or production facility secondary containment	Not Applicable
(c)	Secondary containment area maintenance	2.1.6.1
(d)	Drainage of secondary containment area	2.1.6.1
(e)	Secondary containment liner	2.1.6.2
(f)	Installation of monitoring wells	Not Applicable
(g)	TTLR secondary containment areas	2.1.6.3
(h)	SFAST secondary containment areas	2.1.6
(i)	“failsafe” definition	Not Applicable
18 AAC 75.080		
(a)	Facility piping	2.1.7
(b)	Facility piping maintenance	2.1.7
(c)	Facility piping placed in service after 12/30/2008	Not Applicable
(d)	Buried piping placed in service between 5/14/92 and 12/30/08	Not Applicable
(e)	Buried piping placed in service after 12/30/08	Not Applicable
(f)	Cathodic protection on facility oil piping	Not Applicable
(g)	Exposed buried piping inspection	2.1.7.1
(h)	Third party inspection on buried piping without cathodic protection	2.1.7.1
(i)	Piping supports	2.1.7.2
(j)	Third party inspection of aboveground piping	2.1.7.2
(k)	Operation and maintenance of a cathodic protection system	Not Applicable
(l)	Atmospheric piping corrosion	2.1.7.2
(m)	Soil-to-air interface	2.1.7.2
(n)	Piping valves	2.1.7.2
(o)	Out of service piping	2.1.7.3

DEFINITIONS

18 AAC 75.990 Definitions

Definitions relevant to this CPLAN, as defined in 18 AAC 75.990, are provided below.

Approval	means written approval by the department;
Approved	means approved in writing by the department;
Area of Public Concern	a geographic area that, in the department's judgment deserves special protection from an oil discharge, including (A) an area of unique cultural value, historical significance, or scenic importance; (B) an area of substantial residential or public recreational value or opportunity; (C) an area where fish hatcheries or other facilities primarily dependent upon the use of potentially affected water are located; (D) an area significantly used for commercial, sport, or subsistence hunting, fishing, and gathering; and (E) an area where concentrations of terrestrial or marine mammals or bird populations primarily dependent on the marine environment are located;
Barge	means oil barge;
Barrel	a measure of capacity equal to the space occupied by 42 US gallons at 60° F
Best available technology	the best proven technology that satisfies the provisions of 18 AAC 75.425(e)(4) and 18 AAC 75.445(k);
Capacity	storage capacity
Catastrophic oil discharge	an oil discharge in excess of 100,000 barrels, or any other discharge which the governor determines presents a grave and substantial threat to the economy or environment of the state.
Cleanup	efforts to mitigate environmental damage or a threat to human health, safety, or welfare resulting from a hazardous substance, and includes removal of a hazardous substance from the environment, restoration, and other measures that are necessary to mitigate or avoid further threat to human health, safety, or welfare, or to the environment;
Contain	to surround a discharge or release of a hazardous substance with booms, berms, dikes, or other barriers to prevent the further spread of the discharge or release;

Control	to stop, restrict, or deflect the movement of a discharge;
Demonstrate	means to prove through documentation or other evidence to the department's satisfaction;
Demonstration	proof through documentation or other evidence to the department's satisfaction;
Department	the Department of Environmental Conservation;
Discharge	spilling, leaking, pumping, pouring, emitting, emptying, or dumping
Dispersant	a chemical agent used to enhance the breakup of discharged oil into droplets, promoting mixing of oil into the water column and accelerating dilution and degradation rates;
Environmentally sensitive area	a geographic area that, in the department's determination, is especially sensitive to change or alteration, including (A) an area of unique, scarce, fragile, or vulnerable natural habitat; (B) an area of high natural productivity or essential habitat for living organisms; (C) an area of unique geologic or topographic significance that is susceptible to a discharge; (D) an area needed to protect, maintain, or replenish land or resources, including floodplains, aquifer recharge areas, beaches, and offshore sand deposits; (E) a state or federal critical habitat, refuge, park, wilderness area, or other designated park, refuge, or preserve;
EPA	the United States Environmental Protection Agency;
Facility or Operation	any offshore or onshore structure, improvement, vessel, vehicle, land, enterprise, endeavor, or act; "facility" or "facility or operation" includes an oil terminal facility, tank vessel, oil barge, pipeline, railroad tank car, railroad, and an exploration or production facility;
Hazardous substance	(A) an element or compound which, when it enters into the atmosphere or in or upon the water or surface or subsurface land of the state, presents an imminent and substantial danger to the public health or welfare, including but not limited to fish, animals, vegetation, or any part of the natural habitat in which they are found; (B) oil; or (C) a substance defined as a hazardous substance under 42 U.S.C. 9601(14);
Impermeable	using a layer of material that is of sufficient thickness, density, and composition to produce a maximum permeability for the substance being contained of 1 x 10-7 centimeters per second at the maximum

	anticipated hydrostatic pressure, and that is sufficient to contain a discharge or release until it is detected and cleaned up;
Lightering	the pumping or transferring of oil from the cargo compartment of a vessel, barge, storage tank, or container to a different vessel, barge, storage tank, or container;
Major discharge	a discharge of oil (A) over 10,000 gallons on inland waters; (B) over 100,000 gallons on coastal waters; or (C) in any amount that results in a release that (i) might require evacuation or sheltering of nearby residents or businesses; or (ii) causes a serious environmental threat;
Mechanical response method	the use of containment booms, skimmers, and other apparatus and equipment required for mechanical containment and removal of a discharge or release;
Noncrude oil	a petroleum product derived from crude oil;
Nonpersistent product	has the meaning given in AS 46.04.900; means a petroleum-based oil that, at the time of shipment, consists of hydrocarbon fractions – At least 50% of which by volume, distill at a temperature of 340 degrees C (645 degrees F); and At least 95% of which by volume, distill at a temperature of 370 degrees C (700 degrees F).
Nontank vessel	means a self-propelled watercraft of more than 400 gross registered tons; in this paragraph, “watercraft” includes commercial fishing vessels, commercial fish processor vessels, passenger vessels, and cargo vessels, but does not include a tank vessel, oil barge, or public vessel;
Oil	oil of any kind and in any form, whether crude, refined, or a petroleum by-product, including petroleum, fuel oil, gasoline, lubricating oils, oily sludge, oil refuse, oil mixed with other wastes, crude oils, liquefied natural gas, propane, butane, or other liquid hydrocarbons regardless of specific gravity;
Oil barge	a vessel which is not self-propelled and which is constructed or converted to carry oil as cargo in bulk;
Oil spill primary response action contractor	means a person who is or intends to be obligated under contract to the holder of an approved oil discharge prevention and contingency plan issued under AS 46.04.030 to provide resources or equipment to contain, control, or clean up an oil discharged

Oil terminal facility	an onshore or offshore facility of any kind, and related appurtenances, including a deepwater port, bulk storage facility, or marina, located in, on, or under the surface of the land or waters of the state, including tide and submerged land, that is used for the purpose of transferring, processing, refining, or storing oil; a vessel, other than a nontank vessel, is considered an oil terminal facility only when it is used to make a ship-to-ship transfer of oil, and when it is traveling between the place of the ship-to-ship transfer of oil and an oil terminal facility;
Oily waste	any material, including water, that has been contaminated by or mixed with petroleum in other than naturally occurring circumstances;
Open water	“open water” means marine waters below mean low water and freshwaters of the state, excluding wetlands and the wetland or shoreline perimeter of lakes, rivers, and streams;
Operator	the person who, through contract, lease, sublease, or otherwise, exerts general supervision and control of activities at the facility; the term includes, by way of example and not limitation, a prime or general contractor, the master of a vessel and the master’s employer, or any other person who, personally or through an agent or contractor, undertakes the general functioning of the facility;
Owner or Operator	means the owner or operator of a facility or operation that is subject to the requirements of AS 46.04.030, 46.04.040, 46.04.055, or this chapter;
Person in charge	in addition to the person causing or permitting a discharge, Includes (A) for a vessel, the master; (B) for a vehicle, the operator; and (C) the owner or person exercising a possessory interest in the facility or operation at the time of the discharge or release, unless the possessory interest is being exercised solely for the purpose of providing a place of residence for the person;
Physical Barrier	means a concrete or asphalt surface that (A). is impermeable to water; (B) is designed, constructed, and placed in accordance with industry standards; (C) provides enough support thickness, layering, and life to prevent compromising the structural integrity of the material;
Pipeline	the facilities, including piping, compressors, pump stations, and storage tanks, used to transport crude oil and associated hydrocarbons between production facilities or from one or more production facilities to marine vessels;

Plan	an oil discharge prevention and contingency plan approved under this chapter;
Plan holder	an applicant who has received department approval for an oil discharge prevention and contingency plan or nontank vessel plan and who is responsible for compliance with the plan as approved;
Realistic maximum response operating limitation	the upper limit of a combination of environmental factors that might occur at a facility or operation beyond which an operator would be unable to mount a mechanical response to a discharge event;
Release	means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance, but excluding (A) any release that results in exposure to persons solely within a workplace, with respect to a claim that those persons may assert against the persons' employer; and (B) emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, or vessel;
Response planning standard	planning standard against which the department evaluates the adequacy of an oil discharge prevention and contingency plan or nontank vessel plan as described in 18 AAC 75.400 - 18 AAC 75.496; a "response planning standard" does not mean a cleanup level that a plan holder is required to achieve under 18 AAC 75.300 - 18 AAC 75.396;
Responsible person	a person who is required under AS 46.04.020 or AS 46.09.020 to contain or perform a cleanup of a discharge or release of a hazardous substance;
Sensitive gauging system	the best demonstrated available gauging technology at the time of tank construction or substantial reconstruction, or initial gauging system installation;
Significant change	means (A) a change in operational readiness or removal from designated storage of significant equipment or materials; (B.) a management or ownership change resulting in new chain-of-command or lead response personnel; (C) a change in response contractors; (D) a change in spill control or cleanup strategies; or (E) any factor that significantly alters or reduces the ability of the plan holder to respond accordingly to the provisions of the approved contingency plan or nontank vessel plan;

Storage capacity	(A) for a tank vessel or oil barge, either (i) the maximum amount of oil that the vessel can legally carry as cargo while in state waters; (ii) the amount certified by the American Bureau of Shipping, by the United States Coast Guard under a Certificate of Inspection, or by an equivalent society or agency in a foreign country; or (iii) a lesser amount than the amount in (i) or (ii) of this subparagraph, upon proof and verification to the department's satisfaction; (B) for an oil storage tank, the full physical volume of the tank; (C) for a facility, the full physical volume of the oil storage tanks with storage capacities of 1,000 gallons and greater and the piping at that facility; (D) for a nontank vessel, the full physical volume of all fuel tanks, lube oil tanks, hydraulic oil tanks, day tanks, slop/sludge tanks, waste oil tanks, and bilge tanks on the vessel; and (E) for a train, the totally physical volume of all railroad tank cars in the train; (F) for piping, the full physical volume of the piping;
Sufficiently impermeable	for a secondary containment system, that its design and construction has the impermeability necessary to protect groundwater from contamination and to contain a discharge or release until it can be detected and cleaned up; for design purposes for tanks constructed after May 1992, “sufficiently impermeable” means using a layer of natural or manufactured material of sufficient thickness, density, and composition to produce a maximum permeability for the substance being contained of 1 x 10-6 cm per second at a maximum anticipated hydrostatic pressure, unless the department determines that an alternate design standard protects groundwater from contamination and contains a discharge or release until detection and cleanup;
Tank vessel	a self-propelled waterborne vessel that is constructed or converted to carry liquid bulk cargo in tanks and includes tankers, tankships, and combination carriers when carrying oil; the term does not include vessels carrying oil in drums, barrels, or other packages, or vessels carrying oil as fuel or stores for that vessel;
Technology	means the equipment, supplies, or other resources, and related practices;
Toxicity index	the number equal to the sum of the toxicity quotient numbers attributable to systemic toxic effects with similar critical endpoints for similarly responding ecological species;
Toxicity quotient	the ratio of the exposure point value to the ecological benchmark value;
Ultimate disposal	disposal into or upon the waters or the surface or subsurface land of the state;

Vessel	includes tank vessels, oil barges, and nontank vessels;
Wellhead protection area	a three-dimensional land surface and subsurface zone surrounding a water supply well or wellfield that encompasses the volume of materials through which water will move to the well;
Incident command system	the incident management organization described in the National Interagency Incident Management System Incident Command System;
Incident management team services	those services described in the National Interagency Incident Management System Incident Command System;
National Interagency Incident Management System Incident Command System	the command system followed by the National Interagency Incident Management System, as modified for oil spills, and set out in the (A) United States Department of Homeland Security, United States Coast Guard's *Incident Management Handbook*, COMDTPUB P3120.17A, as revised as of August 2006 and adopted by reference; and (B) *Alaska Incident Management System Guide for Oil and Hazardous Substance Response*, Revision 1 as revised as of November 2002 and adopted by reference;
Qualified individual	(A) means an individual with the qualifications, duties, and authority of a qualified individual under 33 C.F.R. 155.1026; the provisions of 33 C.F.R. 155.1026, as revised as of July 1, 2001, are adopted by reference; and (B) does not mean a (i) qualified environmental professional described in 18 AAC 75.333(b) Or (ii) qualified sampler described in 18 AAC 75.333(c);
Region of operation	means, with respect to (A) an oil discharge prevention and contingency plan other than a nontank vessel plan, a region established under 18 AAC 75.495; and (B) a nontank vessel plan, a region established under 18 AAC 75.496;
Area contingency plan	a regional master oil and hazardous substance discharge prevention and contingency plan approved under AS 46.04.210.
Aboveground oil storage tank	for the purposes of 18 AAC 75.065, 18 AAC 75.066, and 18 AAC 75.075, means a container, including a storage and surge tank, that is used to store bulk quantities of oil and that has a capacity of greater than 10,000 gallons; “aboveground oil storage tank” does not include a process pressure vessel or underground storage tank within the meaning of AS 46.03.450;
Cathodic protection	a technique to prevent corrosion of a metal surface by making that surface the cathode of an electrochemical cell through the application of either galvanic anodes or impressed current;

Corrosion	the deterioration of metal from the loss of positively charged metal ions from the metal surface into an electrolyte;
Corrosion expert	a person who (A) by reason of thorough knowledge of the physical sciences and the principles of engineering and mathematics acquired through professional education and related practical experience, is qualified to engage in the practice of corrosion control on buried metal piping and metal tanks, and (B) is accredited or certified as being qualified by NACE International as a corrosion specialist, cathodic protection specialist, or is a registered engineer with education and experience in corrosion control of buried metal piping systems and metal tanks;
Double-walled shop-fabricated aboveground oil storage tank	a shop fabricated aboveground oil storage tank with a surrounding containment tank fully enclosing a sealed interstitial space of a capacity less than 100 percent of the storage tank capacity and preventing visual inspection of the inner tank;
Facility oil piping	piping and associated fittings, including all valves, elbows, joints, flanges, pumps, and flexible connectors, originating from or terminating at (A) an aboveground oil storage tank regulated under 18 AAC 75.065 or 18 AAC 75.066 up to the: (i) union of the piping with a fuel dispensing system; (ii) marine header; (iii) fill cap or fill valve; (iv) forwarding pump used to transfer oil between facilities, between adjacent pump stations, or between a pressure pump station and a terminal or breakout tank; or (v) first flange or connection within a tank truck loading, loading rack containment area; or (B) an exploration or production well, up to the: (i) choke or valve interconnection with a flowline: or (ii) first valve or flange inside a processing unit boundary**;**
Field-constructed aboveground oil storage tank	a welded metal aboveground oil storage tank erected on site where it will be placed in service;
Installation	an aboveground oil storage and surge tanks and associated operational appurtenances, including secondary containment systems, integral piping, overfill protection devices, and associated leak detection equipment;

Permanent unloading areas	unloading areas routinely used for transfer operations; “permanent unloading areas” does not include areas used for short-term emergency response, seasonal usage, or short-term temporary usage to meet unusual operational demands:
Pipe or piping	any hollow cylinder or tube used to convey oil;
Placed in service	commencement of operational use, either after initial construction or installation or (A) for field-constructed aboveground oil storage tanks, after the date of return to service after reconstruction as defined by American Petroleum Institute’s (API) *Tank Inspection, Repair, Alteration, and Reconstruction*, 3rd Edition, December 2001, and Addendum 1, September 2003, (API 653) adopted by reference, or after the date of return to service after being removed from service in accordance with 18 AAC 75.065(o); or (B) for facility oil piping, after the date of return to service after being removed from service in accordance with 18 AAC 75.080(o); or (C) for flow lines, after the date of return to service after being removed from service in accordance with 18 AAC 75.047(f).
Qualified cathodic protection tester	a person who is accredited or certified as being qualified as, at a minimum, CP1-CP Tester by NACE international.
Self-diked aboveground oil storage tank	a shop-fabricated aboveground oil storage tank with integral secondary containment of a minimum capacity of at least 100 percent of the capacity of the tank.
Shop-fabricated aboveground oil storage tank	an oil storage tank that is constructed at a tank manufacturer’s plant and transported to a facility for installation.
Vaulted shop-fabricated aboveground oil storage tank	a shop-fabricated aboveground oil storage tank that is placed within a discrete secondary containment vault system at or below grade.
Application package	the documents required by 18 AAC 75.408(a)(1) -(3) to be included in the application submittal;
Application package is complete	the applicant has provided the information necessary for the department to review and evaluate the plan using the criteria established under 18 AAC 75.445 for oil discharge prevention and contingency plans;
Major amendment	a proposed change to a plan that the department has determined will be reviewed under 18 AAC 75.455 after considering the factors under 18 AAC 75.415(a);

Minor amendment	a proposed change to a plan that the department has determined will not be reviewed under 18 AAC 75.455 after considering the factors
Request for additional information	a request for an applicant by the department for additional information necessary for an application package to be complete;
Sufficient for review	the application package contains the information necessary to begin the public review of the plan including the information identified in (A) 18 AAC 75.408; (B) 18 AAC 75.425(e)(1) – (5) for oil discharge prevention and contingency plans; and (C) supporting documentation as requested by the department.

ACRONYMS

18 AAC 75.425(e)(3)(K) **Additional information – other information necessary to provide background for or verification of the plan contents.**

Acronyms used in this CPLAN are defined below.

AAC	Alaska Administrative Code
ACP	Area Contingency Plan
ADEC	Alaska Department of Environmental Conservation
ADF&G	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resources
AK	Alaska
API	American Petroleum Institute
AWC	Anadromous Water Catalog
BAT	Best Available Technology
bbl	Barrel, in US measurement
CDL	Commercial Driver's License
CFR	Code of Federal Regulations
CG	United States Coast Guard
CH	Channel
CPLAN	Oil Discharge Prevention and Contingency Plan
DOT	United States Department of Transportation
DW	Delta Western, LLC
EDRC	Effective Daily Recovery Capacity
EPA	United States Environmental Protection Agency
ESA	Environmentally Sensitive Area(s)
EUL	Environmental Unit Lead
EUO	Emergency Use Only
F	Fahrenheit Degrees
FAA	Federal Aviation Administration
FCAST	Field Constructed Aboveground Storage Tank
FOSC	Federal On Scene Coordinator
ft	Feet
gal	Gallon
GRS	Geographic Response Strategies
HAZWOPER	Hazardous Waste Operations and Emergency Response
HP	Horsepower
Hrs	Hours

IAP	Incident Action Plan
IBR	International Bird Rescue
IC	Incident Commander
ICS	Incident Command System
IMH	Incident Management Handbook
IMT	Incident Management Team
IWR	International Wildlife Research
PIO	Information Officer
IOSC	Initial On Scene Commander
MOU	Memorandum of Understanding
N/A	Not Applicable
NACE	National Association of Certified Engineers
NOAA	National Oceanic & Atmospheric Administration
NRC	National Response Center (federal notification)
O_2	Oxygen
OHA	Office of History and Archaeology
OOS	Out of Service
ORB	Oil Response Barge
OSC	On Scene Coordinator
OSHA	Occupational Safety and Health Administration
OSRO	Oil Spill Removal Organization
PPE	Personal Protection Equipment
ppm	Parts Per Million
PRAC	Primary Response Action Contractor
QI	Qualified Individual
RP	Responsible Party
RPS	Response Planning Standard
RUL	Resources Unit Lead
S.A.D.	Soluble Aromatic Hydrocarbon Derivation
SCA	Secondary Containment Area
SFAST	Shop Fabricated Aboveground Storage Tank
SO	Safety Officer
SOSC	State On Scene Coordinator
SSB	Single Side Band Radio
SSC	Scientific Support Coordinator
SSHP	Site Safety and Health Plan
TTLR	Tank Truck Loading Rack
USFWS	United States Fish & Wildlife Service
VHF	Very High Frequency

1 RESPONSE ACTION PLAN

18 AAC 75.425(e)(1) **PART 1 - RESPONSE ACTION PLAN: The response action plan must provide, in sufficient detail to clearly guide responders in an emergency event, all information necessary to guide response to a discharge of any size, up to and including a discharge that is equal to the applicable response planning standard set out at 18 AAC 75.430 - 18 AAC 75.442. The response action plan must include the following information.**

The Response Action Plan is provided in the following subsections.

1.1 Emergency Action Checklist

18 AAC 75.425(e)(1)(A) **A short checklist of the immediate response and notification steps to be taken if an oil discharge occurs; it is recommended that this summary be duplicated on a wallet-size card, to be carried by the appropriate response personnel while on duty.**

Below is a short checklist of the immediate response and notification steps that DW employees will follow in the event of an oil discharge.

Safety Actions	• Warn all persons in the immediate area, activate internal alarms • Eliminate all sources of ignition, if safe to do so • Determine safety requirements • Identify the character, exact source, amount, and extent of the release and other information needed for notification
Initiate Control and Containment	• Stop the flow at the source • Transfer product out of damaged tank • Assess and implement prompt removal actions to contain and remove the oil • Deploy containment boom and response equipment • Construct a containment berm • Divert discharged oil to a collection area
Reporting and Notification Policy (see Section 1.2)	• Notify immediate supervisor and Facility Manager • Notify facility response personnel as needed • Notify a Qualified Individual (QI) • Contact agencies as applicable (QI normally completes this)
Transfer of Command	The Facility Manager acting as Initial On Scene Commander (IOSC) shall direct cleanup activities until relieved of this responsibility by an incoming Incident Commander (IC)

1.2 Reporting and Notification

18 AAC 75.425(e)(1)(B) REPORTING AND NOTIFICATION - a description of the immediate spill reporting actions to be taken at any hour of the day, including: (i) title and telephone number of facility personnel responsible for making the notification; and (ii) telephone number of each appropriate government agency to be notified if a discharge occurs.

It is DW's policy that all releases, regardless of size or location, are reported to the Facility Manager and the immediate supervisor of the individual who identifies the release. The Facility Manager will then notify a QI who will make the appropriate notifications as defined in Section 1.2.2. An initial spill report form is also filled out by onsite personnel. A copy of the initial spill report form is provided in an appendix to this CPLAN.

Reporting is the required notification to governmental agencies of a discharge of oil as required by law. Reporting to agencies may be made within a reasonable time after initial knowledge of the discharge if the responsible party is engaged in initial spill response actions.

The Facility Manager or designee will make notification to:

- A DW QI, as soon as the scene is secure
- 9-1-1, when people are at risk of injury, fire, or other hazards, and for over-all public welfare
- If a QI is not reached, the Facility Manager or designee shall notify agencies per the agency threshold table below
- Activate local response resources, if needed; the DW QI will activate the Primary Response Action Contractor (PRAC), if needed
- Complete and submit an Initial Oil Spill Report Form, and other requested information, to the DW QI

The DW QI will:

- Make all agency notifications in accordance with the agency spill reporting table
- Make other agency notifications as applicable
- Complete and submit reporting documentation to applicable agencies
- Activate PRAC, if needed

1.2.1 Company Emergency Contacts

Notification list of contacts for an oil spill, or the threat of an oil spill, is provided below. Wallet Cards containing DW QI phone numbers are issued to all DW oil handling personnel.

Table 1.2.1-1 Facility Emergency Contacts and Qualified Individuals

Name	Position	Cell	Office	Fax	Time
Facility Personnel:					
Jake Eckhardt	IOSC	907-231-3518	907-766-3190	907-766-3196	
Garret Lyons	Alt. IOSC	907-841-5348	Use Cell	907-276-3741	
DW QIs:					
Christina Bentz	QI / Alt QI	907-331-8075	907-265-3836	907-276-3741	
Wyatt Morgan	QI / Alt QI	907-280-8038	907-265-3825	206-213-0103	
Heather Fricaud	QI / Alt QI	907-231-3533	907-265-3836	907-276-3741	
Amanda Dotten	QI / Alt QI	907-351-5862	907-265-3836	907-276-3741	

1.2.2 Agency Notification Thresholds

The QI will notify applicable agencies in accordance with regulatory requirements:

Table 1.2.2-1 Agency Notifications

Agency	Spill Size	Verbal Report	Number
Oil			
National Response Center (NRC) Coast Guard (CG)	Any on or threatening water	Immediately	1-800-424-8802
NRC United States Environmental Protection Agency (EPA)	Any size on land but threatening or on surface waters (i.e., tundra, etc.)	Immediately	1-800-424-8802
ADEC	On water - any size	Immediately	1-800-478-9300
ADEC	On land - over 55 gallons	Immediately	1-800-478-9300
ADEC	On land - over 10 to 55 gallons	48 hours	1-800-478-9300
ADEC	On land - 1 to10 gallons	Monthly	Written report
ADEC	In lined SCA - over 55 gallons	48 hours	1-800-478-9300
Hazardous Substance			
ADEC	Any size	Immediately	1-800-478-9300
NRC (CG, EPA)	If reportable quantity is exceeded	Immediately	1-800-424-8802

Notes: Document calls on an ICS 214 form, this page, or via alternative method
Notifying local CG is not required but would be a courtesy call. **Call the NRC.**

1.2.3 Additional Emergency and Non Emergency Contacts

Additional contacts, including, DW's PRAC and Incident Management Team (IMT) contractors; local resources; and other potential governmental agency contacts are provided in the tables below.

Table 1.2.3-1 Additional Contacts

PRAC & IMT Contractors			Contact Name	Time
PRAC	Southeast Alaska Petroleum Response Organization (SEAPRO)	907-225-7002		
IMT	Witt/O'Brien's IMT	985-781-0804		

Table 1.2.3-2 Local Emergency Notifications and Additional Emergency Contacts

Local Public Safety Contacts	Contact Numbers
Haines Borough Police Department	911 or 907-766-6430
Harbors, Port Office	907-766-6450
Fire	911 or 907-766-6430
EMS	911
Haines Health Center, SEARHC	907-766-6300
City & Borough of Haines, Borough Manager	907-766-6404
Water Utility	907-766-6452
Local TV/Radio Station	
KHNS Public Media	907-766-2020
Emergency Planning	
State Emergency Response Commission (SERC)	907-428-7000
Local Seafood Processors	
Haines Packing Company	907-766-2883
Local Native/Village Corporation	
Chilkat Indian Village	907-767-5505
Central Council of the Tlingit and Haida Indian Tribes of Alaska	907-586-1432
Chilkoot Indian Association	907-766-2323
Other Local Contacts	
Haines Airport, Superintendent	907-465-4512
Haines Airport, Manager	907-766-2340

Table 1.2.3-3 Initial Notifications

Agency	Phone Number
ADEC Toll-Free (24 hr)	1-800-478-9300
Alaska Department of Natural Resources (ADNR) Office of History and Archeology	907-269-8721 (OHA Desk)
ADNR – Statewide Abatement of Impaired Land Section	907-465-3513 dnr.sero.spill@alaska.gov
CG Sector Juneau	907-463-2000
Alaska Department of Fish and Game (ADF&G) Juneau	907-465-4290 907-465-6384 (Alternate)
EPA Anchorage	907-271-5083
EPA Region 10	206-553-1263
US Fish & Wildlife Service (USFWS), Regional Spill Response Coordinator	907-242-6893 (24 Hour)
US National Marine Fisheries (NMFS)	907-586-7630 907-586-7285 (Alternate)
Alaska (AK) Department of the Interior (Anchorage)	907-271-5011

Note: Excluding those lands conveyed or withdrawn, the State of Alaska DNR (ADNR) manages most tidelands and submerged lands from the line of mean high tide and seaward to a line three nautical miles distant from the mean low tideline. In addition, ADNR manages most shorelands below ordinary high water, and over 100 million acres of uplands spread throughout the state. Spills impacting ADNR land call for notification, consultation, and coordination with ADNR. Certain response activities on state land may require permitting from ADNR. Such activities include those that go beyond uses that are Generally Allowed, e.g., anchoring a response vessel in the same location for more than 14 days or using heavy equipment on state land. To inquire about whether a spill is impacting state land or if response strategies require permitting, please contact ADNR trough the contact methods identified in Table 1.2.3-3 of this plan.

1.3 Safety

18 AAC 75.425(e)(1)(C) SAFETY - based on applicable safety standards, a description of the steps necessary to develop an incident-specific safety plan for conducting a response.

It is DW's policy that safety of personnel, responders, and the public are the top priorities during a spill response.

An incident-specific Site Safety and Health Plan (SSHP) may be developed, depending on the severity of the incident. Small or non-complicated spills that do not require DW to stand up a full IMT, may not develop a written SSHP.

The SSHP will typically be developed by the Safety Officer (SO) and will be designed for response personnel operating under the Incident Command System (ICS). See Section 3.3.3.4 of this CPLAN for a description of the SO's duties. DW will use an IC-208 form, or equivalent. The SSHP will be intended to meet the requirements of the Hazardous Waste Operations and Emergency Response regulation (Title 29 CFR Part 1910.120). The Facility Manager will serve as the SO until relieved by DW IMT or contracted personnel. Contact information for the Facility Manager is located in Section 1.2.1 of this CPLAN.

In developing the incident-specific SSHP the following listed information should be considered:

- Identification of SO including contact information
- Objectives of the Operations (Example Objectives Listed Below)
  - Spill Containment/Cleanup
  - Controlled Entry
  - First aid/Rescue
  - Fire Suppression
- Hazard Identification and Evaluation
  - Chemical Hazards (Listing Levels of the Chemical and Level Related to Flammability, Corrosive, Toxicity etc.)
  - Physical Agents (Including, Hypothermia, Noise, Slips/Trips Falls etc.)
  - Other Hazards (Biological, Confined Space, etc.)
- Site Access and Control Information
  - Site Map
  - Command Post Location
  - Medical Service (for Responders) Location
- Weather and Environmental Conditions (such as: Temperature, Sea State, Wind Speed and Direction etc.)
- Emergency Contacts for Local Response Support (Fire, Hospital/Clinic)
- Routes, Exposure and Information for (Substance) Found on Safety Data Sheets
- Air Monitoring/Respiratory Protection Information including limits in parts per million (ppm) for exposure and monitoring intervals

- Safety/Personal Protective Equipment (Hard Hat, Work Gloves, Tyvek Suit) for different Work Areas (Exclusion/Hot Zone, Decontamination Zone)
- A written or diagram for Decontamination of Responders Leaving the Exclusion/Hot Zone

1.4 Communications

18 AAC 75.425(e)(1)(D) COMMUNICATIONS - a description of field communications procedures, including, if applicable, assigned radio channels or frequencies and their intended use by response personnel.

The IOSC, or designee, is responsible for the establishment of communications until relieved by a member of the IMT. The IOSC will:

1. Assesses size and complexity of the spill to determine initial communications requirements
2. Designate radio channels used for spill response
3. Maintains a log of communications

When activated, the IMT is responsible for providing equipment and internal and external procedures for communications through the following tasks:

1. Develop plans for use of communications equipment and facilities
2. Installing, testing, maintaining, and repairing communications equipment
3. Supervise incident Communications Centers
4. Distributing incident communications equipment to incident personnel

Table 1.4-1 Facility Radio Equipment

Type	Quantity	Comments
Handheld VHF Intrinsically Safe	5-7	In facility office, with facility personnel, and in trucks
Mobile Truck Radios	1 each	

Radios are tested daily as part of normal operations. Repairs or replacement is made when necessary.

1.4.1 Communications Network and Systems

DW has a statewide communications network. This network can handle the communications needs of any spill throughout the areas of operations, which includes:

- The DW administrative offices
- The DW operations facilities at Juneau, Haines, Yakutat, Sitka, Ketchikan, Dutch Harbor, and Bethel

The communications network is comprised of the following components:

Table 1.4.1-1 Communication Equipment

Type	Description
Land Lines and Fax Machines	The DW network includes standard land line telephones and fax machines at each land based DW office.
Cellular Phones	All DW management staff including the Facility Manager carry cell phones. Additional cell phones are readily available for purchase if needed. Cellular phones will be distributed as appropriate. Cell phone service is available in most locations where DW operates in AK.
Handheld VHF Radios	Handheld VHF radios are maintained at DW facilities and are available for use. These are the primary on scene mode of communications between response personnel. Handheld VHF radios that will be used in a suspected or known hazardous atmosphere must be intrinsically safe.
Base Station VHF Radios	Most DW facilities have a VHF base station, with either 110v or 12v power. Base stations have greater range than handheld units and can be used for command functions.

The DW Communications Network and Systems described above, can be supplemented with PRAC or contractor communications equipment. These include equipment available via lease or purchase to provide voice, fax, and data transmission capabilities through portable satellite units and integrated two-way radio systems as needed.

In addition, various state and federal agencies in AK maintain significant communications equipment statewide which may also be available to supplement a spill response, especially during the initial response phase. These are identified in the AK Regional Contingency Plan and the four associated Area Contingency Plans (ACP).

Section 1.4 of the SEAPRO's Technical Manual contains the communications management plan, communication inventory (including repeaters) and maintenance, daily operations, expanded network, communications practices.

1.4.2 Communications Centers

The primary communications center in the event of a spill will be the DW facility office, or local Incident Command Post. Other communications centers may include DW offices or other contracted facilities.

Alternate Communication center locations can be found in the Southeast Alaska Area Contingency Plan (ACP), March 2021, Section 5220.1, page 5-4.

1.4.3 Communications Forms and Frequencies

Depending on the complexity of the spill, an Incident Radio Communications Plan (ICS 205) may be prepared as a summary of the Radio Requirements Worksheet (ICS 216) providing information on all radio frequency assignments down to the Division/Group level for each operational period. Additional ICS forms that will be used in the event of a full spill include:

- ICS 205A – Communications List
- ICS 214 – Unit Log
- ICS 214a – Individual Log

The following frequency guidance information should be followed for any spill incident.

Table 1.4.3-1 VHF Frequencies

Type	Description
Marine VHF Channel 10[1]	Will be monitored during response operations
Marine VHF Channels 68, 69, 71, 72, and 78	Non-commercial channels that MAY BE USED during a spill response
Marine VHF Channels 13, 15, 16, 17, 21, 23, 81, 82 and 83	MAY NOT BE USED unless specific permission has been granted by the CG
Additional Marine VHF Frequencies	Will be designated, as appropriate
Frequency 155.295	AK state emergency frequency
Marine Single Sideband (SSB) 4125.00MHz	Designated frequency within AK waters
SSB 4125 and 2182 and Marine VHF Frequencies	Are utilized by the CG

[1]Or other agreed upon channels

1.5 Deployment Strategies

18 AAC 75.425(e)(1)(E) DEPLOYMENT STRATEGIES - a description of proposed initial response actions that may be taken, including:

(i) procedures for the transport of equipment, personnel, and other resources to the spill site, including plans for alternative methods in adverse weather conditions;

(ii) if the operator is not the primary spill responder, procedures to notify and mobilize the response action contractor or other responder identified in the plan, including a description of the interim actions that the operator will perform until the responder identified in the plan initiates a full response to the discharge.

The DW IOSC/IC will mobilize local DW resources in Haines to initiate the response. Additional resources, if needed, will be brought in as described below.

The primary response resources to contain or control and cleanup a discharge from the facility are located as follows:

- DW Haines personnel and equipment
- SEAPRO equipment and personnel located in Haines, Skagway, and Juneau
- DW IMT personnel

The IOSC/IC will conduct an on-going assessment of the spill conditions. A comparison of the resources required for the proposed tactics to equipment ordered will be conducted. If equipment from other regions is deemed required from this assessment it will be ordered.

Table 1.5-1 Response Resource Transit Times to Site

Location	Owner	Resources	Transport Modes	Transit to Deployment Site
Haines	DW	Personnel	Vehicle	Immediate to 1 Hour
Haines	DW	Equipment	Load pickup truck Launch work boat	0-2 Hours 0-1 Hour
Haines	SEAPRO	Equipment	Load pickup truck On water deployment	2 Hours 2 Hours
Haines	SEAPRO	Responders	Vehicle	2 Hours
Juneau	SEAPRO	Equipment and personnel	Air Vessel	6 Hours 8 Hours
Skagway	SEAPRO	Equipment and personnel	Air Vessel	6 Hours10 Hours
Sitka	SEAPRO	Equipment	Air Vessel	7 Hours 27 Hours
Ketchikan	SEAPRO	Equipment	Air Vessel	8 Hours 31 Hours
Gustavus	SEAPRO	Equipment	Air Vessel	6 Hours 23 Hours

See SEAPRO Technical Manual Section 5 Mobilization/Deployment Strategies for transportation of those resources. See Section 3.5 of this CPLAN for logistical support including alternate transportation methods.

If weather conditions prevent the actual transit of personnel and equipment, they will be maintained "ready" for immediate mobilization when the weather changes. Assessment and planning will continue during this time.

If required, SEAPRO resources (equipment and/or personnel) will be mobilized. The decision to mobilize these resources will be at the discretion of the QI in consultation with the IOSC/IC. This will typically occur in the event of a large or complicated discharge.

Interim actions taken to control the spill while awaiting the arrival of additional SEAPRO response resources may include:

1. Secure the source of discharge (i.e., close valves); take actions to reduce the flow
2. Isolate and secure spill area
3. Terminate all sources of ignition
4. Initiate preliminary response actions relative to the spill incident, which may include, but are not limited to:
    - Deploy containment boom along the dock face to enclose area/limit the spread, or
    - Deploy boom in cascade configuration from the dock or from the shore to deflect boom product from the shoreline, or
    - Deploy boom in U-configurations to trap oil, or
    - Dig a trench to contain oil then use sorbent material.
5. Begin SSHP

6. Establish Command Center
7. Establish Staging Area
8. Conduct assessment of spill impacted area
9. Initiate aerial surveillance
10. Make additional notifications

1.6 Response Scenario

18 AAC 75.425(e)(1)(F)

RESPONSE SCENARIO - a written description of a hypothetical spill incident and response that demonstrates a plan holder's ability to respond to a discharge of each applicable response planning standard volume within the required time frames using the resources described in the contingency plan and that identifies the spill location, time of year, and time of day, the source and cause of the spill, the quantity and type of oil spilled, the relevant environmental conditions, including weather, sea state, and visibility, the spill trajectory, and the expected timeline for response actions, describing response actions to be taken; the response scenario must be usable as a general guide for a discharge of any size, must describe the discharge containment, control, and cleanup actions to be taken, which clearly demonstrate the strategies and procedures adopted to conduct and maintain an effective response, and if the response scenario is for an exploration or production facility, must also meet the applicable requirements of (I) of this paragraph; if required by the department, the plan holder must provide additional response strategies to account for variations in receiving environments and seasonal conditions; if the information required by this subparagraph is contained within a separate document developed by the plan holder or the plan holder's primary response action contractor identified in (3)(H) of this subsection, the plan holder may incorporate the information by reference upon obtaining the department's approval.

This hypothetical spill scenario illustrates the response actions to a discharge from an oil incident at the Haines Bulk Facility. The scenario is designed to demonstrate through its PRAC, SEAPRO, how DW would respond to an oil discharge in the Southeast Area.

Spill Location:	Haines Bulk Facility
Time of Year:	Spring
Time of Day:	0600 Alaska Daylight Time
Source and cause of spill:	An unexplained catastrophic weld seam failure releases all the contents of Tank 6. The force of the instantaneous release causes a section of the SCA wall to fail and product to escape containment.
Quantity and type of oil spilled:	Type: Diesel Adjusted Response Planning Standard (RPS): 3,514 barrels (bbls) / 147,572 gallons RPS to reach water: 238 bbls / 10,000 gallons
Relevant environmental conditions, including:	
Weather: Sea State: Visibility:	Overcast, wind speed of 8 knots from NW, 48°F Light chop <2 feet, current is 2 knots 10 miles
Spill trajectory:	The spill travels 800 feet north through a forested area, with the majority of the release pooling on land or being absorbed into the soils. A small portion of the spill flows across Lutak Road to reach the waters of Lutak Inlet. Once on water, the release moves to the northwest with the wind and the tide.
Expected timeline for response actions:	See ICS 201 and Oil Recovery Table in Section 1.6.12 of this CPLAN

1.6.1 Procedures to Stop the Discharge

18 AAC 75.425(e)(1)(F)(i)	**Procedures to stop the discharge at its source and prevent its further spread.**

Procedures to stop the discharge at its source and prevent its further spread may include the following depending on specific site and situation:

- Stop pumps, close valves - stop the product flow
- Turn off electrical sources
- Assess failure
- Determine if a "plug" or “patch” can be installed to stop or reduce the flow
- Consider transferring product from a damaged tank or piping system to another tank and piping system
- If product has escaped the SCA, consider constructing dams, berms, trenches or fence barriers
    - DW has response equipment and personnel to construct appropriate temporary containments. The IOSC is responsible for determining the most appropriate sites for these efforts when applicable.
- If an oil spill is flowing in a depression or ditch, consider constructing a simple dam from earth, snow, rocks, logs, debris or any other readily available materials and cover with an impermeable liner if available.
    - If pooling or stream-flow is anticipated, consider incorporating an underflow dam as described in the STAR Manual, B-III-4-1.

The STAR Manual is available online. See Section 3.11 of this CPLAN for a link to the manual.

1.6.2 Fire Prevention and Control

18 AAC 75.425(e)(1)(F)(ii)	**A description of methods to prevent or control a potential fire hazard.**

Initial response actions that can be taken to prevent or control a potential fire hazard are as follows:

- Call 9-1-1, notify a coworker
- Extinguish all flames, if safe to do so
- Shut-off main electrical power supply
- All radios used around spilled product must be intrinsically safe

Electrical power shutoffs are located:

- In the electric control building at the Truck Rack (Tank Farm and TTLR shutoffs)

1.6.3 Discharge Tracking and Forecasting of Shoreline Contact

18 AAC 75.425(e)(1)(F)(iv)	**Procedures and methods for real-time surveillance and tracking of the discharged oil on open water and forecasting of its expected points of shoreline contact.**

In the event of a discharge to open water, DW will use a combination of resources for surveillance/tracking of discharged oil and for forecasting purposes. The resources selected will depend on the size of the release and will be comprised of a scalable approach. Tools available include:

- Current tide tables (available at the DW facility office)
- Projected trajectories provided on the ICS 204 forms later in this section (created using NOAA's WebGNOME, see Section 3.11 of this CPLAN for a link to WebGNOME)
- Visual surveillance
- Air or sea surveillance
- STAR Manual, Sections B-II-1-1 (plume delineation on land), B-II-2-1 (discharge tracking on water), and B-II-3-1 (aerial observation supporting nearshore operations). See Section 3.11 of this CPLAN for a link to the STAR Manual.

DW will initiate visual surveillance and incorporate air or sea surveillance during a major discharge incident as conditions and accessibility permit and as approved by the IMT and/or Unified Command (UC) (see Section 3.5 for potential air charter companies). In a large spill situation, the CG may also conduct over flights. SEAPRO's waterproof drone may be used to perform over flights. The drone can send real time streaming video and photos. Information from overflights/observations will provide on-going reports of spill trajectory including expected points of shoreline contact and any changes in weather conditions that could affect the migration of the spill and may be relayed to National Oceanic & Atmospheric Administration (NOAA) or a contractor for spill trajectory modeling. The National Weather Service may be consulted as needed to determine weather forecasting and to assist in predicting the spill trajectory.

1.6.4 Protection of Environmentally Sensitive Areas and Areas of Public Concern

18 AAC 75.425(e)(1)(F)(v)	**For a stationary facility or operation, a description of site-specific strategies for the protection of environmentally sensitive areas and areas of public concern identified under (3)(J) of this subsection, including, for a land-based facility, protection of groundwater and public water supplies; if identification of those areas and site-specific strategies for protection of those areas are in an applicable subarea contingency plan, the plan holder may incorporate that information by reference.**

Site-specific strategies for protecting Environmentally Sensitive Areas (ESAs) and areas of public concern, involve first identifying resources at risk. References for identifying resources at risk include:

- Southeast Alaska ACP, Section 9740
- Geographic Response Strategies for Southeast Alaska: Portage Cove (SE08-05)
- Protection of Historic Properties
- SEAPRO Technical Manual, Section 3.10, Protection of ESAs

More information regarding the locations and protection strategies for ESAs in the region are addressed in Section 3.10 of this CPLAN.

Links to each of the above listed resources are located in Section 3.11 of this CPLAN.

Resources at risk are summarized on the ICS 232 form later in this section.

Strategies to consider for protecting ESAs may include:

- Controlling the release and spread of the discharge at the source
- Deploy containment boom around the source of the spill
- Deploy boom in a configuration that protects the sensitive areas based on GRSs, over flights, and spill trajectories
- Informal consultation with staff from wildlife trustee agencies
- Initiate passive wildlife protection
- Identify and prioritize sensitive areas through the ACP and GRSs

1.6.5 Containment and Control Strategies

18 AAC 75.425(e)(1)(F)(vi)	**A description of the actions to be taken to contain and control the spilled oil, including, as applicable, boom deployment strategies, construction of temporary berms, and other methods.**

Anticipated containment and control strategies that would be utilized are outlined on the ICS 215 and supporting ICS 201 and 204s (Task Forces 1, 2, and 3) later in this section.

STAR MANUAL, Section B: Tactics, Part III and B-III-1 through 11 covers mechanical response options and containment and recovery tactics, respectively. See Section 3.11 of this CPLAN for a link to the STAR Manual.

1.6.6 Recovery Strategies

18 AAC 75.425(e)(1)(F)(vii)	**A description of the actions to be taken to recover the contained or controlled oil using mechanical response options, including procedures and provisions for skimming, absorbing, or otherwise recovering the contained or controlled product from water or land.**

Anticipated recovery strategies that would be utilized are outlined on the ICS 215 and supporting ICS 204s (Task Forces 1, 2, and 3) later in this section.

STAR MANUAL, B-III-5-1, B-III-6-1, B-III-7-1, B-III-9, and B-III-10 describe recovery strategies for nearshore free-oil recover, on-water free oil recovery, on-land recovery, marine recovery, and shoreside recovery, respectively. See Section 3.11 of this CPLAN for a link to the STAR Manual.

1.6.7 Damaged Tank Transfer and Storage

18 AAC 75.425(e)(1)(F)(viii)	**Procedures for lightering, transfer, and storage of oil from damaged tanks or from undamaged tanks that might be at risk of discharging additional oil.**

The following tank to tank transfer procedures have been pre-identified for use in the event of a damaged tank for conducting a tank to tank procedure:

1. Assess damage – as appropriate isolate tank, piping, and valves in leaking system
2. Align existing piping from damaged tank to another tank for tank to tank transfer
3. Gauge receiving tank to ensure sufficient outage capacity for holding transferred product
4. Test overfill alarm
5. If there is no existing piping for a tank to tank transfer or if the existing piping is unusable, set up and use a DW portable transfer pump with hoses and compatible fittings. Connections can be made to the tank water draw valves.

Transfer options are available through existing infrastructure at the TTLR. Product can be transferred between like product tanks using existing infrastructure.

In the unlikely event all storage tanks are full, temporary storage may include small portable tanks/containers at the facility, SEAPRO, SEAPRO member Memorandum of Understanding (MOU), a tank barge, or locally available contractor tankage for hire. Refer to Table 3.5-1 for additional storage capacity contact information.

1.6.8 Recovered Oil and Oily Water Transfer and Storage

18 AAC 75.425(e)(1)(F)(ix)	**Procedures for transfer and storage of recovered oil and oily water, including methods for estimating the amount of recovered oil.**

DW will utilize pumps, hoses, and fittings that are compatible for the transfer of oil to containerize/collect recovered oil and/or oily water into totes, drums, or other compatible containers. These will be used for storage and/or transportation between the spill site and a staging or temporary storage area (see Section 1.6.9).

Recovered oil/water mixtures will be allowed to settle and separate from water to estimate the amount of recovered oil as described in the STAR Manual Appendix C, page D-7.

Anticipated transfer and storage procedures that would be utilized are outlined on the ICS 204s (Task Forces 1, 2, 3, and 8) and ICS 209 later in this section.

STAR MANUAL, B-III-16-1, B-III-17-1, and B-III-18-1 describe procedures for marine based storage and transfer; land based storage and transfer; and pumping oily liquids, respectively. See Section 3.11 of this CPLAN for a link to the STAR Manual.

1.6.9 Temporary Storage and Ultimate Disposal for Oily and Solid Waste

18 AAC 75.425(e)(1)(F)(x)	**Procedures and locations for temporary storage and ultimate disposal of oil contaminated materials, oily wastes, and sanitary and solid wastes, including procedures for obtaining any required permits or authorizations for temporary storage or ultimate disposal.**

DW has tankage, drums, and other compatible storage containers available for temporary storage of recovered products. Oiled sorbent pads and debris would be stored in drums.

DW has a Waste Management Plan template developed for quick implementation in the event of a release. The template defines anticipated waste streams, labelling, required permits and authorizations, and disposal options. This is not included here due to the sensitive nature of this internal document. See the ADEC Area Plan References and Tools website for the Waste Management and Disposal Job Aid. A link is provided in Section 3.11 of this CPLAN.

Anticipated temporary storage and disposal that would be utilized are outlined on the ICS 204s (Task Force 1, 2, 3, and 8) later in this section**.**

STAR MANUAL, B-III-16-1, B-III-17-1, and B-III-18-1 describe procedures for marine based storage and transfer; land-based storage and transfer; and pumping oily liquids, respectively. STAR MANUAL, A-III-7 additionally provides a waste management checklist. See Section 3.11 of this CPLAN for a link to the STAR Manual.

1.6.10 Wildlife Protection

18 AAC 75.425(e)(1)(F)(xi)	**Procedures and methods for the protection, recovery, disposal, rehabilitation, and release of potentially affected wildlife, including: minimizing wildlife contamination through hazing or other means, when appropriate; the recovery of oiled carcasses to preclude secondary contamination of scavengers; and the capture, cleaning, rehabilitation, and release of oiled wildlife, when appropriate.**

A wildlife response would be coordinated through the IMT and SEAPRO when necessary to minimize negative impacts to wildlife such as:

- Keeping spilled oil away from wildlife and their habitats
- Preventing unnecessary or illegal disturbance to sensitive species and habitats such as nesting raptors, seabird rookeries, and marine mammal haulout and pupping areas
- Preventing illegal collection of wildlife parts by spill response personnel. Both the Bald and Golden Eagle Protection Act and the Marine Mammal Protection Act prohibit collection and possession of animal parts (including feathers from Bald eagles)
- Preventing wildlife from coming into contact with cleaning agents and/or bioremediation substances used for shoreline treatment with hazing

SEAPRO has a contract with the International Bird Rescue (IBR) and International Wildlife Research (IWR). IBR provides wildlife experts with the training necessary to rescue and rehabilitate birds and some small terrestrial furbearers, not including sea otters. IWR is approved for the response and treatment of all marine mammals including sea otters. The wildlife expert shall assess the spill in terms of potential impact on wildlife, develop a Wildlife Response Plan, obtain permits necessary to engage in wildlife hazing or rescue and rehabilitation.

Responders will report whether sea otters, or other marine mammals, are in the area of the spill and, if so, will observe the animals to determine if they are impacted. For handling species that are outside of SEAPRO's contracted ability, SEAPRO has an understanding with IBR that IBR will be responsible for contracting an NMFS approved wildlife responder.

A specialist from NOAA NMFS will provide oversight and permitting/authorizations for carcass collection, deterrence, and capture of marine mammals and Endangered Species Act (ESA)-listed species under their jurisdiction (NMFS 2017). A specialist from USFWS will provide oversight for any actions that are taken with regards to sea otters, eagles, migratory birds, and ESA-listed species under their jurisdiction (see Table 1.2.3-3 for contact information). ADF&G will provide oversight and permitting for hazing of migratory birds, and for carcass collection, hazing, and capture and rehabilitation of terrestrial

animals. A complete list of permits and authorizations is located in the Wildlife Protection Guidelines for Oil Spill Response in Alaska, Section 4820.1, Table 4-1. NOAA's Pinniped and Cetacean Oil Spill Response Guidelines and the Arctic Marine Mammal Disaster Response Guidelines provide guidance on dealing with marine mammals during a spill response (Ziccardi, et al. 2015 and NMFS 2017).

Federal laws and regulations will limit the activities of DW personnel with respect to handling migratory birds, marine mammals, and other wildlife. Under these laws and regulations, it is illegal for anyone to take or handle marine wildlife except personnel from the responsible government entities or individuals authorized to take or handle marine wildlife by the proper authorities. Carcass disposal will not occur without coordination with wildlife agencies.

Plans for protection, recovery, disposal, rehabilitation, and release of wildlife affected by an oil spill are subject to and will follow the guidance provided in the Wildlife Protection Guidelines for Oil Spill Response in Alaska (see Section 3.11 of this CPLAN for a link to the Area Plan References and Tools website).

Dead, oiled wildlife must be collected and disposed of to prevent secondary contamination of wildlife which will scavenge carrion. Dead, oiled wildlife will be collected and labeled with chain of custody forms according to the Wildlife Protection Guidelines for Oil Spill Response in Alaska and shall be submitted to the appropriate wildlife resource agency (USFWS, NMFS, or ADF&G) or their representative. Incident-specific protocols for the disposal of dead, oiled wildlife will be developed by the Environmental Unit with input from the wildlife resource agencies.

Site-specific strategies for protecting wildlife, involve first identifying resources at risk. References for identifying resources at risk include:

- The Southeast ACP, which is the primary tool for identifying ESAs (biological and wildlife) that may be impacted and is available online
- The SEAPRO Technical Manual covers wildlife response and SEAPRO notification, trained personnel, bird hazing, equipment and is available online (see SEAPRO Response Manual, Section 3.10, Wildlife Protection & Response).
- Wildlife reconnaissance and informal consultation with staff from wildlife trustee agencies: ADF&G, USFWS, and NOAA NMFS (See Table 1.2.2-1 for contact information).
- Wildlife Protection Guidelines for Oil Spill Response in Alaska (version 2020.1)

These and additional information on wildlife response may be found on the Area Plan References and Tools website. See Section 3.11 for a link. See Section 3.10 of this CPLAN for information regarding specific protection sites and discussion on species present in the area.

Available wildlife hazing equipment is described in Section 3.6 of this CPLAN.

Resources at risk are summarized on the ICS 232 and wildlife response efforts are detailed on the ICS 204 (Task Force 7) form later in this section.

1.6.11 Shoreline Cleanup Plan

18 AAC 75.425(e)(1)(F)(xii)	**If applicable, a description of procedures for the deployment of shoreline cleanup equipment and personnel, including cleanup and restoration methods and techniques to be used if the shoreline is impacted by the discharge.**

When determined essential due to size and/or nature of the spill, initial shoreline assessments will be conducted by the Shoreline Cleanup Assessment Technique (SCAT) team to assess the impact of oil on shorelines and develop a shoreline cleanup plan. SCAT usually consists of state, federal, responsible party (RP), and landowners as appropriate.

Following approval of the shoreline cleanup plan, shoreline cleanup response and logistical support would be mobilized, and the shoreline cleanup plan implemented. All personnel designated for shoreline cleanup will be trained in cleanup techniques and procedures and the use of cleanup equipment. For a major incident, personnel for shoreline cleanup will be supplied under contract. See Section 3.11 of this CPLAN for a link to the Area Plan References and Tools, Planning Section for SCAT.

Collection, storage, and disposal methods for oily wastes would be followed as described in Section 1.6.8 and 1.6.9 above. Shoreline cleanup efforts are detailed on the ICS 204 (Task Force 6) form later in this section.

STAR MANUAL, B-III-14-1 and B-III-15-1 describe tactics for beach berms and exclusion dams and cold water deluge, respectively. See Section 3.11 of this CPLAN for a link to the STAR Manual.

1.6.12 ICS Forms and Table of Oil Recovery

This scenario depicts oil spill response activities for the RPS due to a spill originating from the DW Haines Bulk Facility.

The scenario in ICS format constitutes a “useable guide” for responders. The ICS 204s developed for this scenario are meant to be operationally based to allow for a faster response time. The strategies, tactics and methods can be tested and updated based on lessons-learned from drills, exercises and incidents. The ICS forms can also be easily updated when the new equipment is purchased.

The scenario ICS forms presented here represents the response efforts of DW. In an actual event, agency information such as ADEC, CG, local government and resource agency personnel and resources would be added to the ICS Forms. Updates made during an operational period will be addressed during a 24-hour operational period.

The overall response objectives and strategies are summarized below.

Safety Actions

- Ensure safety of all responders
- Ensure safety of vessels
- Secure response area (air and water)

Source Control

- Secure facility (shut off open valves)
- Identify resources

Containment, Control, and Recovery of Oil

- Maximize mechanical containment, control, and recovery of oil
- Minimize shoreline impact
- Prepare all required and necessary permits from agencies
- Prepare and implement shoreline cleanup based on sites identified by the SCAT team
- Ensure effective waste management

Protection of Sensitive Resources

- Identify and prioritize ESAs and areas of public concern.
- Protect wildlife resources by following the Wildlife Protection Guidelines for Oil Spill Response in Alaska (see Section 3.11 of this CPLAN for a link to this document)
- Prepare SCAT Plan and conduct SCAT surveys

Public Outreach

- Communicate spill response information to the public
- Develop process to receive public input

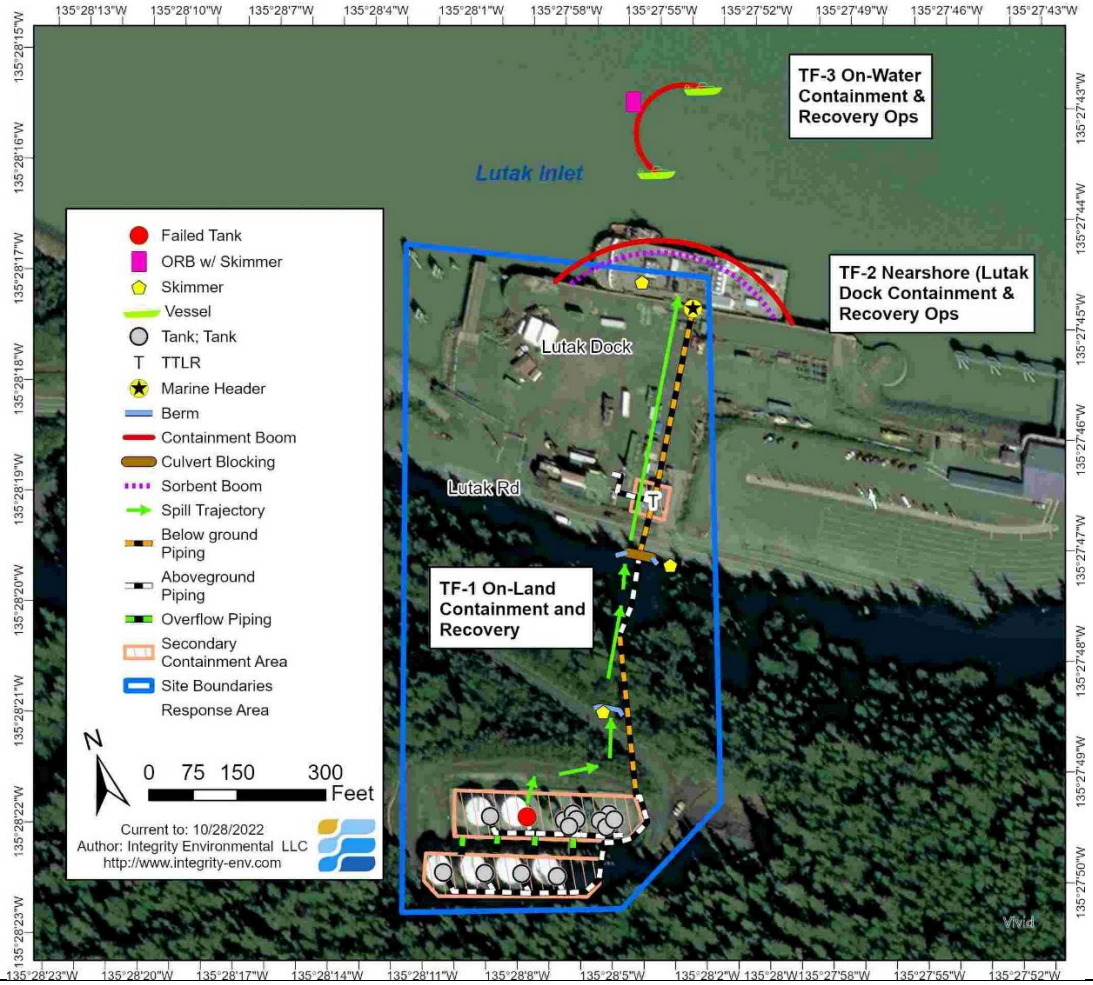
- Communicate spill response information to community leaders and stakeholder groups
- Establish and maintain claims process

The ICS forms and table of oil recovery for DW's response scenario are provided on the following pages.

ICS 201 Haines RPS Scenario

1. Incident Name Haines Facility Scenario	2. Prepared By: DW Date: 04/15 Time: 0600	INCIDENT BRIEFING ICS 201-CG

3. Map/Sketch



4. Incident Timeline

0600 Spill discovered
0610 DW IOSC conducts internal QI notification
0615 QI calls SEAPRO to request responders and mobilization of local equipment
0630 QI conducts agency notifications (NRC [CG/EPA] and ADEC); assemble onsite personnel
0645 Operations/safety brief by DW IOSC
0655 Deploy DW skiff with 100’ containment boom and 100’ sorbent boom around the Lutak Dock
0745 Anchor set and booming complete
0815 SEAPRO equipment arrives on scene and is staged in the yard.
0845 DW Skim-Pak 4200 SH skimmer is deployed within the primary boom and discharges to available storage

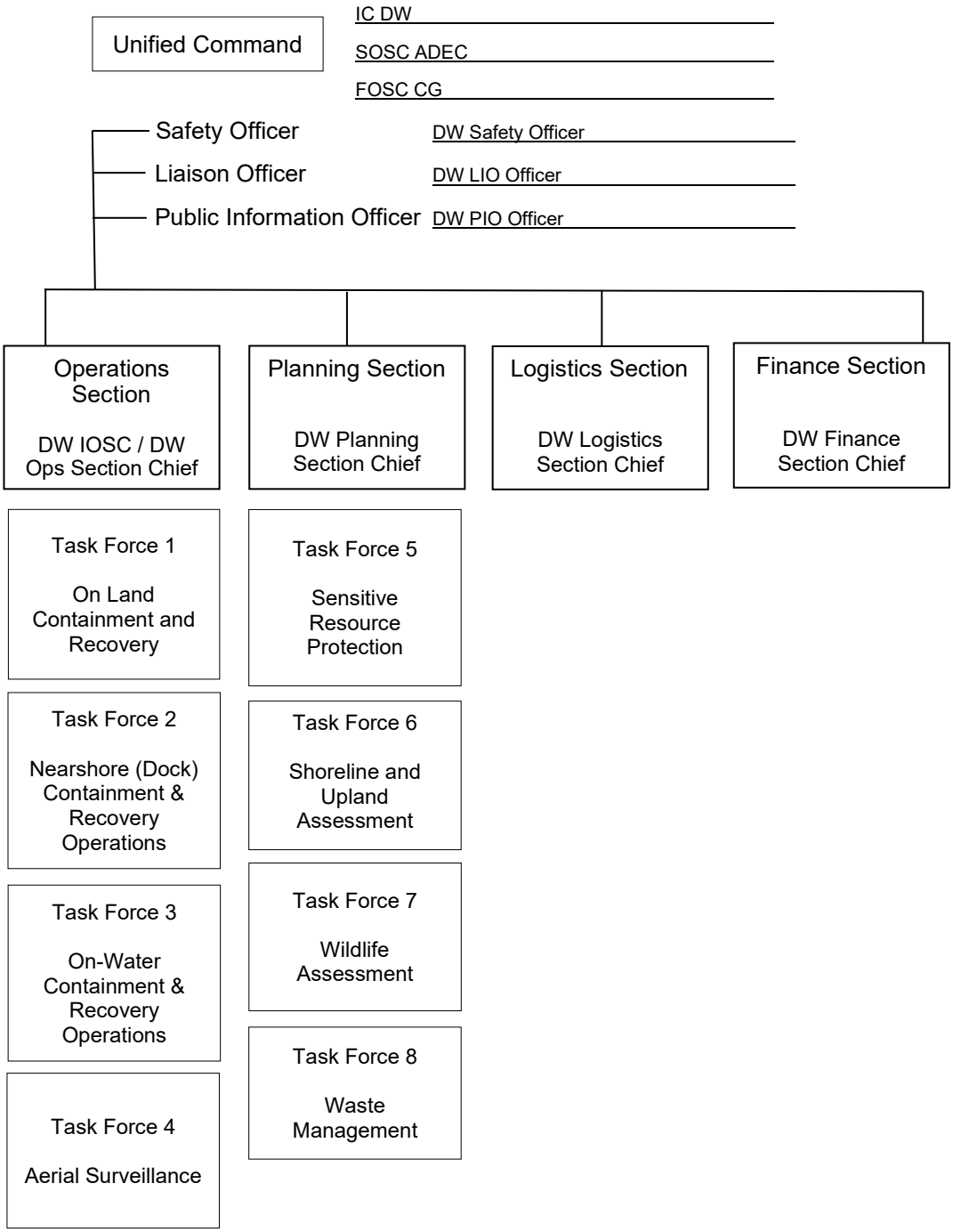
5. Initial Response Objectives, Current Actions, Planned Actions Set by IOSC

Ensure safety of responders and public
Contain, control, and recover spilled oil
Complete all required notifications
Mobilized resources
Protection of ESAs and economic areas

ICS 201 Haines Facility Scenario

1. Incident Name Haines Facility Scenario	**2. Prepared by:** DW **Date:** 04/15 **Time:** 0600	INCIDENT BRIEFING ICS 201-CG

6. Current Organization (fill in additional appropriate organization)



ICS 201 Haines Facility Scenario

1. Incident Name Haines Facility Scenario	**2. Prepared by:** DW **Date:** 04/15 **Time:** 0600	INCIDENT BRIEFING ICS 201-CG

7. Resources Summary (using ICS 213rr)

Resource	Resource Identifier	Time Ordered	ETA	On-Scene (X)	Notes (location/assignment/status)
DW Personnel (2)	DW	0615	0645	X	TF-1, TF-2, and TF-8
Responders (Haines) (5)	SEAPRO	0615	0815		TF-1
Crucial Rope Mop (Skagway) (1)	SEAPRO	0615	1215		TF-1
Crucial C13/24 Disc Skimmer (Skagway) (1)	SEAPRO	0615	1215		TF-1
Aquaguard RBS Skimmer (Sitka) (1)	SEAPRO	0615	1215		TF-1
Pump (1)	DW	0615	0645	X	TF-1
Suction Hose 2” x 20’ (4)	DW	0615	0645	X	TF-1 and TF-2
Discharge Hose 2” x 50’	DW	0615	0645	X	TF-1
Hose floats 2” (4)	DW	0615	0645	X	TF-1 and TF-2
55-gallon drums (20)	DW	0615	0645	X	TF-1
Hand tools, plywood, visqueen (multiple)	DW	0615	0645	X	TF-1
Sorbent pads (1000)	DW	0615	0645	X	TF-1
Sorbent sweep (100 feet)	DW	0615	0645	X	TF-1
Sorbent roll (6)	DW	0615	0645	X	TF-1
Tank Truck (2)	DW	0615	0815	X	TF-1, TF-2, TF-3, and TF-8
Contracted barge (>4,000 bbl)	Private Contract	0615	0815		TF-1, TF-2, TF-3, and TF-8
Canflex Portable Tank (Haines) (1)	SEAPRO	0615	0815		TF-1
Responders (Haines) (2)	SEAPRO	0615	0815		TF-2
Skim-Pak 4200 SH (1)	DW	0615	0645	X	TF-2
Skimmer pump (1)	DW	0615	0645	X	TF-2
Containment boom (300 feet)	DW	0615	0645	X	TF-2
Sorbent boom (Juneau) (960 feet)	SEAPRO	0615	1215		TF-2
Sorbent boom (440 feet)	DW	0615	0645	X	TF-2
Canflex Sea Slug FCB-43 (100 bbl) (Haines) (1)	SEAPRO	0615	0815		TF-2
Vikoma Towable Bladder (Juneau) (1)	SEAPRO	0615	1215		TF-2
Canflex Sea Slug FCB-60 (Juneau) (157 bbl) (1)	SEAPRO	0615	1215		TF-2
Response skiff (1)	DW	0615	0645	X	TF-2
Tow bridles (2)	DW	0615	0645	X	TF-2

1. Incident Name Haines Facility Scenario	**2. Prepared by:** DW **Date:** 04/15 **Time:** 0600	INCIDENT BRIEFING ICS 201-CG

7. Resources Summary (using ICS 213rr)

Resource	**Resource Identifier**	**Time Ordered**	**ETA**	**On-Scene (X)**	**Notes (location/assignment/ status)**
Anchor buoy system (6)	DW	0615	0645	X	TF-2
Boom lights (4)	DW	0615	0645	X	TF-2
Responders (Juneau) (6)	SEAPRO	0615	1215		TF-3
Action Petroleum Multi Skimmer (Haines) (1)	SEAPRO	0615	0815		TF-3
Containment Boom (Haines) (200 feet)	SEAPRO	0615	0815		TF-3
Oil Response Barge (Haines) (2)	SEAPRO	0615	0815		TF-3
SEAPRO MOU Tug w/work boat (Skagway) (1)	SEAPRO	0615	1215		TF-3
Responder (Juneau) (1)	SEAPRO	0615	1215		TF-4
Waterproof Drone (Ketchikan) (1)	SEAPRO	0615	1415		TF-4
Contract Helicopter and operator (1)	Private Contract	0615	0715		TF-4
Responders (Juneau) (4)	SEAPRO	0615	1215		TF-5
Containment boom o/b ORBs (Haines) (700 feet)	SEAPRO	0615	0815		TF-5
Work Skiff (Haines/Juneau) (2)	SEAPRO	0615	0815 04/16 at 0215		TF-5
Responder (Juneau) (1)	SEAPRO	0615	1215		TF-6
Work Skiff (Gustavus) (1)	SEAPRO	0615	1315		TF-6
Responders (Juneau) (3)	SEAPRO	0615	1215		TF-7
Field Hazing Kit (Haines) (1)	SEAPRO	0615	0815		TF-7
Work Skiff (Juneau) (1)	SEAPRO	0615	1415		TF-7
DESMI DOP-160 with hose (Haines) (1)	SEAPRO	0615	0815		TF-8
Decon Equipment (Haines) (1)	SEAPRO	0615	0815		All Task Forces

ICS 204 Task Force 1 On-Land Containment and Recovery

1. Incident Name Haines Facility Scenario	**2. Operational Period (Date/Time)** From: 04/15 at 0600 To: End		**Assignment List ICS 204-OS**
3. Task Force 1	**4. On Land Containment and Recovery**		
5. Operations Personnel	**Name**	**Affiliation**	**Contact # (s)**
Initial Incident Commander:	IOSC	DW	Ch 10/cell
Operations Section Chief:	DW	DW	Ch 10/cell

6. Resources Assigned This Period "X" indicates special instructions

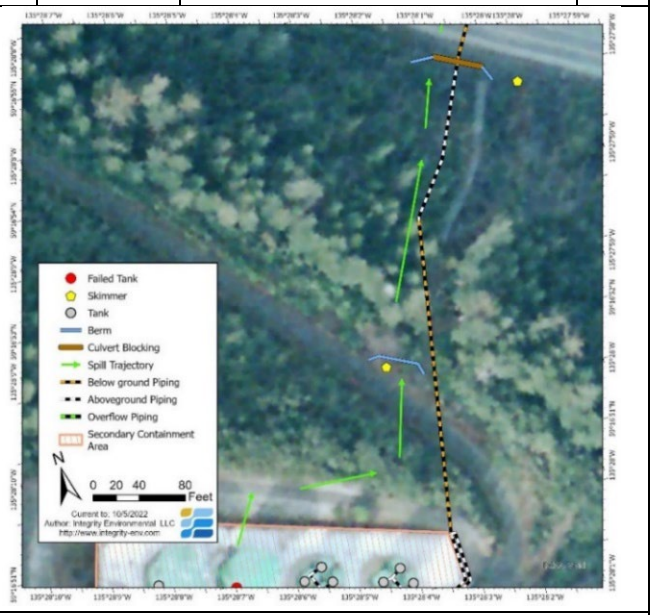
Type	Qty.	Ownership	Staging Area	Notes/Remarks	
Responders	2	DW	DW TTLR		☒
Responders	5	SEAPRO	DW TTLR		☒
Crucial Rope Mop	1	SEAPRO	DW TTLR	To recover pooled product on land	☒
Crucial C13/24 Disc Skimmer	1	SEAPRO	DW TTLR	To recover pooled product on land	☒
Aquaguard RBS Skimmer	1	SEAPRO	DW TTLR	To recover pooled product on land	☒
Pump, hoses, floats	Mult.	DW	DW TTLR	To recover pooled product in SCA	☒
55-gallon drums	20	DW	DW TTLR	Use for temporary storage	☒
Hand tools, plywood, visqueen, and sorbent (pads, sweep, and rolls)	Mult.	DW	DW TTLR	Use to construct berms	☒
Tank Trucks - 69 and 62 bbl	2	DW	DW TTLR	To transfer product to contracted barge	☒
Canflex Portable Tank	1	SEAPRO	Facility	Storage of recovered liquids	☒
Contracted Barge (>4,000 bbl)	1	Private Contract	Lutak Dock	Storage of recovered liquids	☒

7. Assignments

Remove debris along base of pipeline corridor. Block pipeline culvert with plywood or metal sheeting. Use hand tools to create berm along base of pipeline area to contain any mobile spilled product. Place visqueen or liner material in trench with sorbent materials to contain product leaching from soils. Construct another berm closer to the release, intercepting the spill path to create another collection site.

Deploy skimmers in pooled product on land and discharge to 55-gallon drums and portable tank. Product is transferred to barge when it arrives.

See STAR Manual Section B-III-3, Dikes, Berms, & Dams, Section B-III-7, On-Land Recovery, and Section B-III-17, Land-based Storage & Transfer of Oily Liquids.



8. Special Instructions for Division/Group All operations require PPE. All responders must sign tailgate safety brief and read SSHP (when available). Immediately report sightings of oiled wildlife to the IC.

9. Communications (radio and/or phone contact numbers needed for this assignment)

Name/Function	Radio: Freq/System/Channel	Phone
DW Responders (2)	Channel 10	N/A
SEAPRO Responders (5)	Channel 10	N/A
	Total Responders:	7

10. Prepared By (Resource Unit Leader) Planning Section	**11. Approved By (Planning Section Chief) Date/Time**

ASSIGNMENT LIST ICS 204-OS

ICS 204 Task Force 2 Nearshore (Lutak Dock) Containment & Recovery Operations

1. Incident Name Haines Facility Scenario	**2. Operational Period (Date/Time)** From: 04/15 0600 To: End	**Assignment List ICS 204-OS**
3. Task Force 2	**4. Nearshore Containment & Recovery Operations**	

5. Operations Personnel	**Name**	**Affiliation**	**Contact # (s)**
Initial Incident Commander:	IOSC	DW	Ch 10/cell
Operations Section Chief:	DW	DW	Ch 10/cell

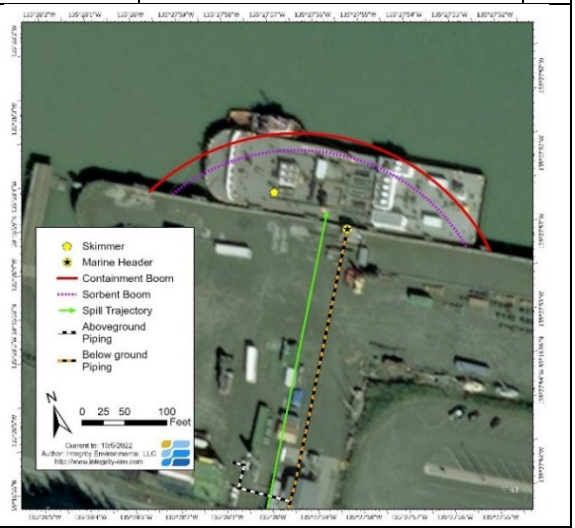
6. Resources Assigned This Period "X" indicates special instructions

Type	**Qty.**	**Ownership**	**Staging Area**	**Notes/Remarks**	
Responders	2	DW	Lutak Dock		☒
Responders	2	SEAPRO	Lutak Dock		☒
Skim-Pak 4200 SH and pump	1	DW	Lutak Dock	Oil recovery	☒
Containment boom	300 ft	DW	Lutak Dock		☒
Sorbent boom	1,500 ft	DW/SEAPRO	Lutak Dock	Used to line containment boom	☒
Canflex Sea Slug FCB-43E Bladder (100 bbl)	1	SEAPRO	Lutak Dock	Recovered liquid storage	☒
Vikoma towable bladder	1	SEAPRO	Lutak Dock	Recovered liquid storage	☒
Canflex Sea Slug FCB-60	1	SEAPRO	Lutak Dock	Recovered liquid storage	☒
Response Skiff	1	DW	Lutak Dock	Used to assist with boom deployment	☒
Tank Trucks - 69 and 62 bbl	2	DW	Lutak Dock	Transfer of recovered liquids	☒
Boom lights, anchors, tow bridles	Mult.	DW	Lutak Dock	Used to support deployment and recovery tactics	☒
Contracted barge (>4,000 bbl)	1	Private Contract	Lutak Dock	Storage of recovered liquids	☒

7. Assignments - Deploy containment boom around the release site on water and near the Lutak Dock. Line the containment boom with sorbent boom to recover product on the water. Monitor and replace sorbent boom if it becomes saturated during the response.

Recover free product from inside the primary boom at the shoreline near the dock using skimmers, pumps, and hoses. Discharge to Canflex bladder and portable tank. Once at 90% capacity, recovered liquid in storage devices to be pumped to tank trucks for transfer to contracted barge. Deploy sorbent sweeps after the skimmers are no longer effective to recover the thinnest concentrations of product on the water.

See STAR Manual Section B-III-2, Containment Boom, Section B-III-10, Shoreside Recovery, and Section B-III-11, Passive Recovery.



8. Special Instructions for Division/Group Water operations – requires PFD. All operations require PPE. All responders must sign tailgate safety brief and read SSHP (when available). Read tides and currents when provided. Immediately report sightings of oiled wildlife to the IC.

9. Communications (radio and/or phone contact numbers needed for this assignment)

Name/Function	Radio:	Phone
DW Responders (2)	Channel 10	N/A
SEAPRO Responders (2)	Channel 10	N/A
	Total Responders:	4

10. Prepared By (Resource Unit Leader) Planning Section	**11. Approved By (Planning Section Chief) Date/Time**
ASSIGNMENT LIST	ICS 204-OS

ICS 204 Task Force 3 On-Water Recovery Operations

1. Incident Name Haines Facility Scenario	**2. Operational Period (Date/Time)** From: 04/15 at 0600 To: End		**Assignment List ICS 204-OS**
3. Task Force 3	**4. On-Water Recovery Operations**		
5. Operations Personnel	**Name**	**Affiliation**	**Contact # (s)**
Initial Incident Commander:	IOSC	DW	Ch 10/cell
Operations Section Chief:	DW	DW	Ch 10/cell

6. Resources Assigned This Period "X" indicates special instructions

Type	Qty.	Ownership	Staging Area	Notes/Remarks	
Responders	6	SEAPRO	Lutak Dock		☒
Action Petroleum Multi skimmer	1	SEAPRO	Lutak Dock	Used for on-water recovery	☒
Containment boom	200 ft	SEAPRO	Lutak Dock	Used for on-water containment	☒
ORB 7 and 8 (249 bbl)	2	SEAPRO	Lutak Dock	Temporary storage	☒
MOU Tug (Skagway) with work boat	1	SEAPRO	Lutak Dock	Used to assist in the skimming efforts - Collection	☒
Tank Trucks - 69 and 62 bbl	2	DW	Lutak Dock	Transfer of recovered liquids	☒
Contracted barge (>4,000 bbl)	1	Private Contract	Lutak Dock	Recovered liquid storage	☒

7. Assignments: Review spill trajectories and obtain on-scene reports of oil movement from field responders. Target leading edge of spill in Lutak Inlet. Contain and recover free oil and prevent impact to sensitive resources. Anticipate tidal changes and shift assets to maximize oil recovery efforts.

Once ORB 7 is at 90% capacity, relocate to Lutak Dock where recovered liquid in ORB 7 will be pumped to tank trucks for transfer to contracted barge. Rotate empty ORB 8 for continued on-water recovery. Once ORB 7 has been offloaded and ORB 8 is at 90% capacity, rotate ORB 7 into recovery tactic. Continue rotation of ORBs as necessary.

Refer to STAR manual, Figure FO-5 J-configurations for on-water recovery.

See STAR Manual Section B-III-2, Containment Boom, Section B-III-6, On-water Free-oil Recovery.

8. Special Instructions for Division/Group Water operations – requires PFD; read tides and currents when provided. All operations require PPE. All responders must sign tailgate safety brief and read SSHP (when available). Immediately report sightings of oiled wildlife to the IC.

9. Communications (radio and/or phone contact numbers needed for this assignment)

Name/Function	Radio: Freq/System/Channel	Phone
SEAPRO Responders (6)	Channel 10	N/A
	Total Responders:	6

10. Prepared By (Resource Unit Leader) Planning Section	**11. Approved By (Planning Section Chief) Date/Time**
ASSIGNMENT LIST	ICS 204-OS

ICS 204 Task Force 4 Aerial Surveillance & Tracking

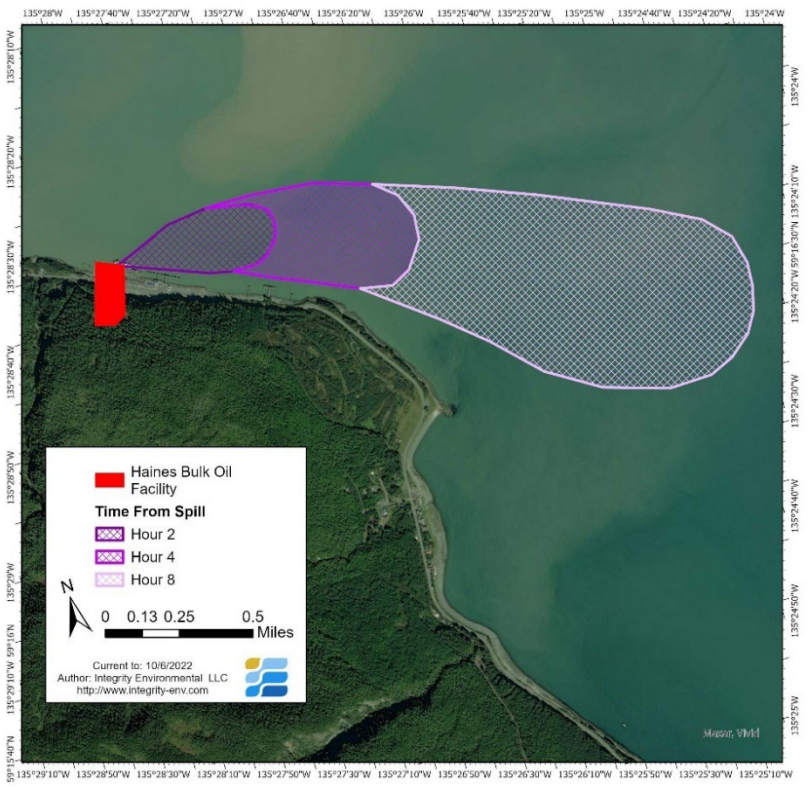
1. Incident Name Haines Facility Scenario	2. Operational Period (Date/Time) From: 04/15 at 1200 To: End	Assignment List ICS 204-OS
3. Task Force 4	4. Aerial Surveillance & Tracking	

5. Operations Personnel	Name	Affiliation	Contact # (s)
Initial Incident Commander:	IOSC	DW	Ch 10/cell
Operations Section Chief:	DW	DW	Ch 10/cell

6. Resources Assigned This Period "X" indicates special instructions

Type	Qty.	Ownership	Staging Area	Notes/Remarks	
Responder	1	SEAPRO	DW Facility	On-water spill tracking. Responder is FAA-certified to operate a drone.	☒
Waterproof drone	1	SEAPRO	DW Facility	On-water spill tracking, once available	☒
Contract helicopter and operator	1	Private contract	HNS Airport	Initial overflights and/or if adverse weather conditions prevent operations of the drone	☒

7. Assignments:
Spill trajectory at hours 2, 4, and 8 without containment and recovery operations.



8. Special Instructions for Division/Group Water operations – requires PFD. All operations require PPE. All responders must sign tailgate safety brief and read SSHP (when available). Read tides and currents when provided. Immediately report sightings of oiled wildlife to the IC.

9. Communications (radio and/or phone contact numbers needed for this assignment)

Name/Function	Radio: Freq/System/Channel	Phone
SEAPRO Responders (1)	Channel 22	N/A
Contract Aircraft (1)	Channel 22	N/A
Agency Personnel (2)	Channel 22	N/A
	Total Responders:	4

10. Prepared By (Resource Unit Leader) Planning Section	11. Approved By (Planning Section Chief) Date/Time
ASSIGNMENT LIST	ICS 204-OS

ICS 204 Task Force 5 Sensitive Area Protection

1. Incident Name	2. Operational Period (Date/Time)	Assignment List
Haines Facility Scenario	From: 04/15 at 0600 To: End	ICS 204-OS

3. Task Force 5	4. Sensitive Area Protection

5. Operations Personnel	Name	Affiliation	Contact # (s)
Initial Incident Commander:	IOSC	DW	Ch 10/cell
Operations Section Chief:	DW	DW	Ch 10/cell

6. Resources Assigned This Period "X" indicates special instructions

Type	Qty.	Ownership	Staging Area	Notes/Remarks	
Responders	4	SEAPRO	Lutak Dock	Use exclusion or deflection booming tactics to protect ESAs	☒
Containment boom	700 ft	SEAPRO	Lutak Dock	Exclusion or deflection booming	☒
Work Skiff	2	SEAPRO	Lutak Dock	Boom deployment	☒

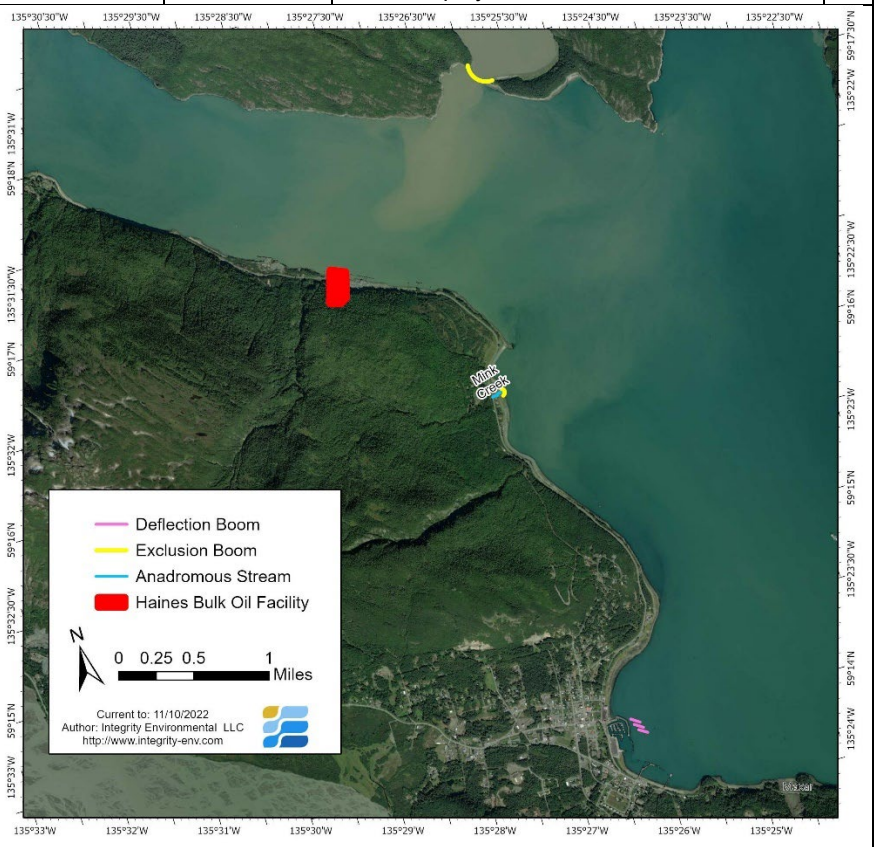
7. Assignments:
See ICS 232 Form for priority protection and GRS implementation.

At the discretion of the IC and Operations Section Chief, deploy exclusion or diversion boom at any threatened anadromous streams and/or boat harbors located west of the release site.

Boom that is on tidally influenced waters will require maintenance through tide changes. The following actions should be taken to ensure the boom is effective:

- Readjust to maintain boom shape through tide cycles
- Continuous monitoring of system is required
- Deployment planning is based on average high tidal conditions

The exclusion and/or diversion boom will remain in place for as long as determined by the IMT.



8. Special Instructions for Division/Group Water operations – requires PFD. All operations require PPE. All responders must sign tailgate safety brief and read SSHP (when available). Read tides and currents when provided. Immediately report sightings of oiled wildlife to the IC.

9. Communications (radio and/or phone contact numbers needed for this assignment)

Name/Function	Radio: Freq/System/Channel	Phone
SEAPRO Responders (4)	Channel 10	N/A
	Total Responders:	4

10. Prepared By (Resource Unit Leader)	11. Approved By (Planning Section Chief) Date/Time
Planning Section	

ASSIGNMENT LIST ICS 204-OS

ICS 204 Task Force 6 Shoreline and Upland Assessment

1. Incident Name	**2. Operational Period (Date/Time)**	**Assignment List**
Haines Facility Scenario	From: 04/15 at 0600 To: End	**ICS 204-OS**

3. Task Force 6	**4. Shoreline and Upland Assessment**

5. Operations Personnel	**Name**	**Affiliation**	**Contact # (s)**
Initial Incident Commander:	IOSC	DW	Ch 10/cell
Operations Section Chief:	DW	DW	Ch 10/cell

6. Resources Assigned This Period "X" indicates special instructions

Type	**Qty.**	**Ownership**	**Staging Area**	**Notes/Remarks**	
Responder	1	SEAPRO	Lutak Dock	Shoreline and upland assessments	☒
Work Skiff	1	SEAPRO	Lutak Dock	Shoreline and upland assessments	☒

7. Assignments: Prepare shoreline and upland assessment implementation plan with team members at the Incident Command Post. Based on spill trajectory, overflights, and migration of product on land determine accessibility by vehicle and/or skiff. Once on-water recovery efforts are completed and based on tide/currents implement assessment plan approved by the Unified Command.

8. Special Instructions for Division/Group Water operations – requires PFD. All operations require PPE. All responders must sign tailgate safety brief and read SSHP (when available). Read tides and currents when provided. Immediately report sightings of oiled wildlife to the IC.

9. Communications (radio and/or phone contact numbers needed for this assignment)

Name/Function	Radio: Freq/System/Channel	Phone
SEAPRO Responder (1)	Channel 10	N/A
Resource Agency Personnel (2)	Channel 10	N/A
	Total Responders:	3

10. Prepared By (Resource Unit Leader)	**11. Approved By (Planning Section Chief) Date/Time**
Planning Section	

ASSIGNMENT LIST ICS 204-OS

ICS 204 Task Force 7 Wildlife Assessment

1. Incident Name	2. Operational Period (Date/Time)	Assignment List
Haines Facility Scenario	From: 04/15 at 0600 To: End	ICS 204-OS

3. Task Force 7	4. Wildlife Assessment

5. Operations Personnel	Name	Affiliation	Contact # (s)
Initial Incident Commander:	IOSC	DW	Ch 10/cell
Operations Section Chief:	DW	DW	Ch 10/cell

6. Resources Assigned This Period "X" indicates special instructions

Type	Qty.	Ownership	Staging Area	Notes/Remarks	
Responders	5	SEAPRO	Lutak Dock	Includes 2 IBR (who are certified to haze) and 2 IWR (who are qualified to respond to otters) personnel under contract to SEAPRO	☒
Field Hazing Kit	1	SEAPRO	Lutak Dock		☒
Work Skiff (Juneau)	1	SEAPRO	Lutak Dock	Capacity to hold a minimum of 2 passengers with gear	☒

7. Assignments: Prepare wildlife assessment potential implementation of hazing techniques. Based on spill surveillance, determine accessibility and protection needs. Report wildlife observations to Environmental Unit for situation status updates. Order additional wildlife resource equipment through Logistics based on observations. Immediately report sightings of oiled wildlife to the IC.

IBR personnel are anticipated to arrive 24 hours after being requested.

Reference: Wildlife Protection Guidelines for Oil Spill Response in Alaska (version 2020.1) https://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/tools/

8. Special Instructions for Division/Group Water operations – requires PFD. All operations require PPE. All responders must sign tailgate safety brief and read SSHP (when available). Read tides and currents when provided. Immediately report sightings of oiled wildlife to the IC.

9. Communications (radio and/or phone contact numbers needed for this assignment)

Name/Function	Radio: Freq/System/Channel	Phone
SEAPRO Responder (1)	Channel 10	N/A
IBR Personnel (2)	Channel 10	N/A
IWR Personnel (2)	Channel 10	N/A
Resource Agency Personnel (2)	Channel 10	N/A
	Total Responders:	5

10. Prepared By (Resource Unit Leader)	11. Approved By (Planning Section Chief) Date/Time
Planning Section/Environmental Unit	

ASSIGNMENT LIST ICS 204-OS

ICS 204 Task Force 8 Waste Management

1. Incident Name	2. Operational Period (Date/Time)	Assignment List
Haines Facility Scenario	From: 04/15 at 0600 To: End	ICS 204-OS

3. Task Force 8	4. Waste Management

5. Operations Personnel	Name	Affiliation	Contact # (s)
Initial Incident Commander:	IOSC	DW	Ch 10/cell
Operations Section Chief:	DW	DW	Ch 10/cell

6. Resources Assigned This Period "X" indicates special instructions

Type	Qty.	Ownership	Staging Area	Notes/Remarks	
Responders	2	DW	DW TTLR	Operate tank trucks	☒
Desmi DOP-160 Pump with hose	1	SEAPRO	DW TTLR/Lutak Dock	Transfer of recovered liquids	☒
Tank Trucks	2	DW	Lutak Dock	Transfer of recovered liquids	☒
Contracted Barge (>4,000 bbl)	1	Private Contract	Lutak Dock	Storage of recovered liquids	☒

7. Assignments: Transfer and storage of recovered product from near shore and land operations. Recovered product is transferred from bladders staged at the dock and temporary storage staged at the TTLR to the contracted barge to be transported off site. Maintain documentation that accounts for quantity of product transferred from each device throughout the response.

8. Special Instructions for Division/Group All operations require PPE. All responders must sign tailgate safety brief and read SSHP (when available). Read tides and currents when provided. Immediately report sightings of oiled wildlife to the IC.

9. Communications (radio and/or phone contact numbers needed for this assignment)

Name/Function	Radio: Freq/System/Channel	Phone
Tank truck driver/personnel (2)	Channel 10	N/A
	Total Responders:	2

10. Prepared By (Resource Unit Leader)	11. Approved By (Planning Section Chief) Date/Time
Planning Section	

ASSIGNMENT LIST ICS 204-OS

ICS 215 Haines Facility RPS Scenario

1. Incident Name	2. Operational Period (Date/Time)	OPERATIONAL PLANNING WORKSHEET
Haines Facility Scenario	From: 04/15 at 0600 To: End	ICS 215-OS

3. Division/Group or Location	4. Work Assignments	5. Resource/Equipment									9. "X" here if 204A is Needed			
		Resource	Containment Boom (feet)	Skimmer	Tank Truck or Loader	Temporary Storage	Personnel	Pumps & Hose	Vessels	Sorbent Boom (feet)	6. Notes/ Remarks	7. Reporting Location	8. Req. Arrival Time	
Task Force 1	On-Land Containment and Recovery	Req.	0	3	2	21	7	0	0	0	*DW responders will be used for TF-1, TF-2, and TF-8	DW TTLR/ Lutak Dock	1215	☒
		Have	0	3	2	21	7	0	0	0				
		Need	0	0	0	0	0	0	0	0				
Task Force 2	Nearshore (Lutak Dock) Containment & Recovery Operations	Req.	300	1	2	3	4	1	1	1,500	†DW tank trucks are reassigned to TF-3 and TF-8 ††SEAPRO skiff is reassigned to TF-6	Lutak Dock	1245	☒
		Have	300	1	2	3	4	1	1	1,500				
		Need	0	0	0	0	0	0	0	0				
Task Force 3	On-Water Recovery Operations	Req.	200	1	2	2	6	0	1	0		Lutak Dock	04/16 at 1315	☒
		Have	200	1	2	2	6	0	1	0				
		Need	0	0	0	0	0	0	0	0				
Task Force 4	Aerial Surveillance & Tracking	Req	0	0	0	0	1	0	0	0		DW Facility	1215	☒
		Have	0	0	0	0	1	0	0	0				
		Need	0	0	0	0	0	0	0	0				
Task Force 5	Sensitive Area Protection	Req.	700	0	0	0	4	0	2	0		Lutak Dock	1415	☒
		Have	700	0	0	0	4	0	2	0				
		Need	0	0	0	0	0	0	0	0				
Task Force 6	Shoreline and Upland Assessment	Req.	0	0	0	0	1	0	1	0		Lutak Dock	04/16 at 1315	☒
		Have	0	0	0	0	1	0	1	0				
		Need	0	0	0	0	0	0	0	0				
Task Force 7	Wildlife Assessment	Req.	0	0	0	0	5	0	1	0		Lutak Dock	04/16 at 1315	☒
		Have	0	0	0	0	5	0	1	0				
		Need	0	0	0	0	0	0	0	0				
Task Force 8	Waste Management	Req.	0	0	2	0	2	1	0	0		DW Facility	1415	☒
		Have	0	0	2	0	2	1	0	0				
		Need	0	0	0	0	0	0	0	0				
10. Total Resources Required			1,200	5	2†	26	26*	2	5††	1,500	**13. Prepared by:** Operations Section			
11. Total Resourced On Hand			1,200	5	2†	26	26*	2	5††	1,500				
12. Total Resources Needed			0	0	0	0	0	0	0	0				

OPERATIONAL PLANNING WORKSHEET **ICS 215-OS**

ICS 232 DW Haines Facility RPS Scenario Resources at Risk

1. Incident Name	2. Operational Period (Date/Time)	Resources at Risk Summary ICS 232-OS
Haines Facility Scenario	From: 04/15 at 0600 To: 04/16 at 0600	

3. Environmentally Sensitive Areas and Wildlife Issues

Site #	Priority	Site Name and/or Physical Location	Site Issues
1	1	Lutak Inlet	Commercial and recreational fishing are - eulachon, coho, pink, chum, sockeye, Dolly Varden, cutthroat, trout in waterway. Waterfowl, seabirds, or marine mammals may be present. Accessible via waterways.
2	2	Ferebee River	Anadromous stream – coho, Dolly Varden, eulachon are present in the waterway.
3	3	Mink Creek	Anadromous stream – pink salmon are spawning, and Dolly Varden are present in the waterway.
4	4	Portage Cove	Commercial and recreational fishing area - coho, Dolly Varden, cutthroat are present in the waterway. Accessible via roadways, trail systems, and waterways.
5	5	Chilkoot River	Anadromous waters - chum, coho, chinook, pink, sockeye, cutthroat, Dolly Varden, eulachon are present in this river. Waterfowl and terrestrial animals are present. Subsistence and commercial fishing – salmon. Recreational use. Accessible via waterways.

Narrative: At the discretion of the IC and the Operations Section Chief, additional response tactics may be required to prevent the release from reaching nearby ESAs. Response tactics include dikes, berms, and trenches; containment boom; exclusion boom; and passive recovery with sorbent materials, including snow. See STAR Manual, Sections B-III-2-1, B-III-3-1, B-III-11-1, and B-III-12-1.

Immediately report sightings of oiled wildlife to the IC.

See Sections 1.6 and 3.10 of this CPLAN for more information recovery strategies, containment and control strategies, wildlife protection, and archeo-cultural and socio-economic factors in the region.

4. Archeo-cultural and socio-economic issues

Site #	Priority	Site Name and/or Physical Location	Site Issues
1	1	Neighboring businesses / adjacent to facility in all directions	Notification to local businesses of spill. Protection prioritization to be conducted by IC and Operations Section Chief. See Section 1.2 for contact information.
2	2	Portage Cove / directly east of the facility	Notification to neighboring tribes of a spill. Protection prioritization to be conducted by IC and Operations Section Chief. See Section 1.2 for contact information.

Narrative: Response tactics to prevent a release from impacting a neighboring business includes dikes, berms, and trenches; containment boom; and passive recovery with sorbent materials, including snow. See STAR Manual, Sections B-III-2-1, B-III-3-1, and B-III-11-1.

All responders are instructed to report any cultural resources found during operations to the Federal On Scene Coordinator (FOSC) Historic Properties Specialist (see Section 3.10.10 of this CPLAN for more information). Immediately report sightings of oiled wildlife to the IC.

Prepared by: Environmental Unit Leader	**Date/Time:**

RESOURCES AT RISK SUMMARY **ICS 232-OS**

ICS 209 Incident Status Summary First Operational Period

1. Incident Name	2. Operational Period (Date/Time)	Time of Report	INCIDENT STATUS SUMMARY ICS 209-OS
Haines Facility Scenario	From: 04/15 at 0600 To: 04/16 at 0600	24 hours	

3. Spill Status (Estimated, in Barrels) [Ops & EUL/SSC]

Source Status: Remaining Potential (bbl): 0

☒ Secured Rate of Spillage (bph): N/A

☐ Unsecured

	Since Last Report	Total (bbl)
Volume spilled to water	238 bbl / 10,000 gallons	238
Volume spilled to land	3,276 bbl / 137,572 gallons	3,276
Total volume spilled	3,514 bbl / 147,572 gallons	3,514

Mass Balance/Oil Budget

	Gallon	Barrel
Recovered Oil Current	13,104	312
Evaporation	NA	NA
Chemical Dispersion	NA	NA
Contained on land	130,104	3,098
Floating, Contained near Dock	4,368	104
Retained in Soil	NA	NA
Total spilled oil accounted for:	147,572	3,514

4. Waste Management (Estimated) [Ops/Disposal]

At the end of this Operational Period 04/16 @ 0600

	Project Recovered (gallon)	Stored (gallon)	Disposed (gallon)
Oily Liquids	35,641	35,641	0
Contaminated gravel	0	0	0

5. Shoreline Impacts (Estimated, in miles) [PSC/EUL/SSC]

Degree of Oiling	Affected	Cleaned	To Be Cleaned
Light	0	0	0
Medium	0	0	0
Heavy	0	0	0
Total	0	0	0

6. Wildlife Impacts [Ops/Wildlife Br.]

	Numbers in () indicate subtotal that are threatened/endangered species.			Died in Facility		
Mammals	0	0	0	0	0	0
Marine Mammals	0	0	0	0	0	0
Fish	0	0	0	0	0	0
Total	0	0	0	0	0	0

7. Safety Status [Safety Officer]

	Since Last Report	Total
Responder Injury	0	0
Public Injury	0	0

8. Equipment Resources [RUL]

Description	Ordered	Available/ Staged	Assigned	Out of Service
Skimmers				
Rope Mop	1	1	1	0
Crucial Disc	1	1	1	0
Aquaguard	1	1	1	0
Skim-Pak	1	1	1	0
Action Petroleum	1	1	1	0
Boom				
Containment Boom	1,200'	1,200'	1,200'	0
Sorbent Boom	1,500'	1,500'	1,500'	0
Storage				
55-gallon drum	20	20	20	0
Portable Tank	1	1	1	0
Sea Slug FCB-43	1	1	1	0
Vikoma Bladder	1	1	1	0
Sea Slug FCB-60	1	1	1	0
ORB	2	2	2	0
Contracted Barge	1	1	1	0
Vessels				
Work/Response Skiff	5	5	5	0
MOU Tug	1	1	1	0

9. Personnel Resources [RUL]

Description	People in Cmd. Post	People in the Field	Total People On Scene
Federal	1	0	1
State	1	2	3
Local	0	0	0
DW	1	2	3
Contract Personnel	2	24	26
Volunteers	0	0	0
Total Response Personnel from all Organizations:			33

11. Special Notes

11. Prepared by: (Situation Unit Leader)

INCIDENT STATUS SUMMARY ICS 209-OS

ICS 209 Incident Status Summary Second Operational Period

1. Incident Name	2. Operational Period (Date/Time)	Time of Report	INCIDENT STATUS SUMMARY ICS 209-OS
Haines Facility Scenario	From: 04/16 at 0600 To: 04/17 at 0600	24 hours	

3. Spill Status (Estimated, in Barrels) [Ops & EUL/SSC]

Source Status: Remaining Potential (bbl): 0

☒ Secured ☐ Unsecured

Rate of Spillage (bph): N/A

	Since Last Report	Total (bbl)
Volume spilled to water	238 bbl / 10,000 gal	238
Volume spilled to land	3,276 bbl / 137,572 gal	3,276
Total volume spilled	3,514 bbl / 147,572 gal	3,514

Mass Balance/Oil Budget

	Gallon	Barrel
Recovered Oil Current	69,678	1,659
Evaporation	NA	NA
Chemical Dispersion	NA	NA
Contained on land	77,894	1,855
Floating, Contained near Dock	NA	
Retained in Soil	NA	NA
Total spilled oil accounted for:	147,572	3,514

4. Waste Management (Estimated) [Ops/Disposal]

At the end of this Operational Period 04/17 @ 0600

	Project Recovered (gallon)	Stored (gallon)	Disposed (gallon)
Oily Liquids	117,558	117,558	0
Contaminated gravel	0	0	0

5. Shoreline Impacts (Estimated, in miles) [PSC/EUL/SSC]

Degree of Oiling	Affected	Cleaned	To Be Cleaned
Light	0	0	0
Medium	0	0	0
Heavy	0	0	0
Total	0	0	0

6. Wildlife Impacts [Ops/Wildlife Br.]

			Numbers in () indicate subtotal that are threatened/endangered species.		Died in Facility	
Mammals	0	0	0	0	0	0
Marine Mammals	0	0	0	0	0	0
Fish	0	0	0	0	0	0
Total	0	0	0	0	0	0

7. Safety Status [Safety Officer]

	Since Last Report	Total
Responder Injury	0	0
Public Injury	0	0

8. Equipment Resources [RUL]

Description	Ordered	Available/ Staged	Assigned	Out of Service
Skimmers				
Rope Mop	1	1	1	0
Crucial Disc	1	1	1	0
Aquaguard	1	1	1	0
Skim-Pak	1	1	1	0
Action Petroleum	1	1	1	0
Boom				
Containment boom	1,200'	1,200'	1,200'	0
Sorbent boom	1,500'	1,500'	1,500'	0
Storage				
55-gallon drum	20	20	20	0
Portable Tank	1	1	1	0
Sea Slug FCB-43	1	1	1	0
Vikoma Bladder	1	1	1	0
Sea Slug FCB-60	1	1	1	0
ORB	2	2	2	0
Contracted Barge	1	1	1	0
Vessels				
Work/Response Skiff	5	5	5	0
Tug	1	1	1	0

9. Personnel Resources [RUL]

Description	People in Cmd. Post	People in the Field	Total People On Scene
Federal	1	0	1
State	1	2	3
Local	0	0	0
DW	1	2	3
Contract Personnel	2	24	26
Volunteers	0	0	0
Total Response Personnel from all Organizations:			33

10. Special Notes

11. Prepared by: (Situation Unit Leader)

INCIDENT STATUS SUMMARY ICS 209-OS

ICS 209 Incident Status Summary Third Operational Period

1. Incident Name	2. Operational Period (Date/Time)	Time of Report	INCIDENT STATUS SUMMARY ICS 209-OS
Haines Facility Scenario	From: 04/17 at 0600 To: End	24 hours	

3. Spill Status (Estimated, in Barrels) [Ops & EUL/SSC]

Source Status: Remaining Potential (bbl): 0

☒ Secured Rate of Spillage (bph): N/A

☐ Unsecured

	Since Last Report	Total (bbl)
Volume spilled to water	238 bbl / 10,000 gal	238
Volume spilled to land	3,276 bbl / 137,572 gal	3,276
Total volume spilled	3,514 bbl /147,572 gal	3,514

Mass Balance/Oil Budget

	Gallon	Barrel
Recovered Oil Current	118,062	2,811
Evaporation	NA	NA
Chemical Dispersion	NA	NA
Contained on land	NA	NA
Floating, Contained near Dock	NA	
Retained in soil	29,527	703
Total spilled oil accounted for:	147,572	3,514

4. Waste Management (Estimated) [Ops/Disposal]

At the end of this Operational Period 04/18 @ 0600

	Project Recovered (gallon)	Stored (gallon)	Disposed (gallon)
Oily Liquids	165,942	165,942	0
Contaminated gravel	0	0	0

5. Shoreline Impacts (Estimated, in miles) [PSC/EUL/SSC]

Degree of Oiling	Affected	Cleaned	To Be Cleaned
Light	0	0	0
Medium	0	0	0
Heavy	0	0	0
Total	0	0	0

6. Wildlife Impacts [Ops/Wildlife Br.]

					Numbers in () indicate subtotal that are threatened/endangered species.	Died in Facility
Mammals	0	0	0	0	0	0
Marine Mammals	0	0	0	0	0	0
Fish	0	0	0	0	0	0
Total	0	0	0	0	0	0

7. Safety Status [Safety Officer]

	Since Last Report	Total
Responder Injury	0	0
Public Injury	0	0

8. Equipment Resources [RUL]

Description	Ordered	Available/ Staged	Assigned	Out of Service
Skimmers				
Rope Mop	1	1	1	0
Crucial Disc	1	1	1	0
Aquaguard	1	1	1	0
Skim-Pak	1	1	1	0
Action Petroleum	1	1	1	0
Boom				
Containment boom	1,200'	1,200'	1,200'	0
Sorbent boom	1,500'	1,500'	1,500'	0
Storage				
55-gallon drum	20	20	20	0
Portable Tank	1	1	1	0
Sea Slug FCB-43	1	1	1	0
Vikoma Bladder	1	1	1	0
Sea Slug FCB-60	1	1	1	0
ORB	2	2	2	0
Contracted Barge	1	1	1	0
Vessels				
Work/Response Skiff	5	5	5	0
Tug	1	1	1	0

9. Personnel Resources [RUL]

Description	People in Cmd. Post	People in the Field	Total People On Scene
Federal	1	0	1
State	1	2	3
Local	0	0	0
DW	1	2	3
Contract Personnel	2	24	26
Volunteers	0	0	0
Total Response Personnel from all Organizations:			33

10. Special Notes

11. Prepared by: (Situation Unit Leader)

INCIDENT STATUS SUMMARY ICS 209-OS

Table 1.6-1 Potential Oil Recovery Table - On Water Assets Only

EDRC in barrels (bbl/day)					(bbl/hr)					(bbl)			(bbl)
Time	HR	Skim-Pak 4200	Action Petroleum Multi Skimmer	Total EDRC	Fuel Recovered	Total Fuel Recovered	Total Oily Water Recovered	Total Liquid Recovered	TSC	Empty TSC	TSC delivered	Available Storage	Capacity
6:00	0			0	0.0	0.0	0	0	0	0	0		
7:00	1			0	0.0	0.0	0	0	0	0	0		
8:00	2			0	0.0	0.0	0	0	0	0	0		
9:00	3	651	480	1131	47.1	47.1	189	236	600	364	600	Canflex Sea Slug FCB-43E	102
10:00	4	651	480	1131	47.1	94.3	87	181	600	419		ORB x 2	498
11:00	5		480	480	20.0	114.3	457	571	600	29			
12:00	6			0	0.0	114.3	457	571	600	29			
13:00	7		480	480	20.0	134.3	537	671	836	165	236	Vikoma Towable Bladder	79
14:00	8			0	0.0	134.3	537	671	836	165		Canflex Sea Slug FCB-60	157
15:00	9			0	0.0	134.3	537	671	836	165			
16:00	10			0	0.0	134.3	537	671	836	165			
17:00	11			0	0.0	134.3	537	671	836	165			
18:00	12			0	0.0	134.3	537	671	836	165			
19:00	13			0	0.0	134.3	537	671	836	165			
20:00	14			0	0.0	134.3	537	671	836	165			
21:00	15			0	0.0	134.3	537	671	836	165			
22:00	16			0	0.0	134.3	537	671	836	165			
23:00	17			0	0.0	134.3	537	671	836	165			
0:00	18			0	0.0	134.3	537	671	836	165			
1:00	19			0	0.0	134.3	537	671	836	165			
2:00	22			0	0.0	134.3	537	671	836	165			
3:00	23			0	0.0	134.3	537	671	836	165			
4:00	24			0	0.0	134.3	537	671	836	165			
5:00	25			0	0.0	134.3	537	671	836	165			
6:00	26			0	0.0	134.3	537	671	836	165			
7:00	27			0	0.0	134.3	537	671	836	165			
8:00	28			0	0.0	134.3	537	671	836	165			
9:00	29	651	480	1131	47.1	181.4	726	907	2175	1268	1339	Contracted Barge	>4000
10:00	30	651	480	1131	47.1	228.5	914	1143	2175	1033			
11:00	31	651	480	1131	47.1	275.6	1103	1378	2175	797			

Daylight Hours
Darkness Hours
First Operational Period
Second Operational Period

TSC = Total Storage Capacity

Table 1.6-2 Potential Oil Recovery Table - On Land Assets Only

EDRC in barrels (bbl/day)					(bbl/hr)			(bbl)				(bbl)
Time	HR	Crucial Rope Mop	Crucial C13/24 Disc	Aquaguard RBS	Total EDRC	Fuel Recovered	Total Fuel Recovered	TSC	Empty TSC	TSC Delivered	Available Storage	Capacity
6:00	0				0	0.0	0.0	0	0			
7:00	1				0	0.0	0.0	0	0			
9:00	2				0	0.0	0.0	181	181	181	55-gal drums x 20	26
10:00	3				0	0.0	0.0	181	181		Tank Trucks	131
11:00	4				0	0.0	0.0	181	181		Canflex Portable Tank	24
12:00	5				0	0.0	0.0	181	181			
13:00	6	120	581	720	1421	59.2	59.2	181	122			
14:00	7	120	581	720	1421	59.2	118.4	181	63			
15:00	8	120	581	720	1421	59.2	177.6	181	3			
16:00	9				0	0.0	177.6	181	3			
17:00	10				0	0.0	177.6	181	3			
18:00	11				0	0.0	177.6	181	3			
19:00	12				0	0.0	177.6	181	3			
20:00	13				0	0.0	177.6	181	3			
21:00	14				0	0.0	177.6	181	3			
22:00	15				0	0.0	177.6	181	3			
23:00	16				0	0.0	177.6	181	3			
0:00	17				0	0.0	177.6	181	3			
1:00	18				0	0.0	177.6	181	3			
2:00	19				0	0.0	177.6	181	3			
3:00	20				0	0.0	177.6	181	3			
4:00	21				0	0.0	177.6	181	3			
5:00	22				0	0.0	177.6	181	3			
6:00	23				0	0.0	177.6	181	3			
7:00	24				0	0.0	177.6	181	3			
8:00	25				0	0.0	177.6	181	3			
9:00	26	120	581	720	1421	59.2	236.8	4181	3944	4000	Contracted Barge	>4000
10:00	27	120	581	720	1421	59.2	296.0	4181	3885			
11:00	28	120	581	720	1421	59.2	355.3	4181	3826			
12:00	29	120	581	720	1421	59.2	414.5	4181	3767			
13:00	30	120	581	720	1421	59.2	473.7	4181	3707			
14:00	31	120	581	720	1421	59.2	532.9	4181	3648			
15:00	32	120	581	720	1421	59.2	592.1	4181	3589			
16:00	33	120	581	720	1421	59.2	651.3	4181	3530			

Table 1.6-2 Potential Oil Recovery Table – on Land Assets Only (Cont'd)

EDRC in barrels (bbl/day)					(bbl/hr)			(bbl)				(bbl)
Time	HR	Crucial Rope Mop	Crucial C13/24 Disc	Aquaguard RBS	Total EDRC	Fuel Recovered	Total Fuel Recovered	TSC	Empty TSC	TSC Delivered	Available Storage	Capacity
17:00	34	120	581	720	1421	59.2	710.5	4181	3471			
18:00	35	120	581	720	1421	59.2	769.7	4181	3411			
19:00	36	120	581	720	1421	59.2	828.9	4181	3352			
20:00	37	120	581	720	1421	59.2	888.1	4181	3293			
21:00	38	120	581	720	1421	59.2	947.3	4181	3234			
22:00	39	120	581	720	1421	59.2	1006.5	4181	3174			
23:00	40	120	581	720	1421	59.2	1065.8	4181	3115			
0:00	41	120	581	720	1421	59.2	1125.0	4181	3056			
1:00	42	120	581	720	1421	59.2	1184.2	4181	2997			
2:00	43	120	581	720	1421	59.2	1243.4	4181	2938			
3:00	44	120	581	720	1421	59.2	1302.6	4181	2878			
4:00	45	120	581	720	1421	59.2	1361.8	4181	2819			
5:00	46	120	581	720	1421	59.2	1421.0	4181	2760			
6:00	47	120	581	720	1421	59.2	1480.2	4181	2701			
7:00	48	120	581	720	1421	59.2	1539.4	4181	2642			
8:00	49	120	581	720	1421	59.2	1598.6	4181	2582			
9:00	50	120	581	720	1421	59.2	1657.8	4181	2523			
10:00	51	120	581	720	1421	59.2	1717.0	4181	2464			
11:00	52	120	581	720	1421	59.2	1776.3	4181	2405			
12:00	53	120	581	720	1421	59.2	1835.5	4181	2346			
13:00	54	120	581	720	1421	59.2	1894.7	4181	2286			
14:00	55	120	581	720	1421	59.2	1953.9	4181	2227			
15:00	56	120	581	720	1421	59.2	2013.1	4181	2168			
16:00	57	120	581	720	1421	59.2	2072.3	4181	2109			
17:00	58	120	581	720	1421	59.2	2131.5	4181	2050			
18:00	59	120	581	720	1421	59.2	2190.7	4181	1990			
19:00	60	120	581	720	1421	59.2	2249.9	4181	1931			
20:00	61	120	581	720	1421	59.2	2309.1	4181	1872			
21:00	62	120	581	720	1421	59.2	2368.3	4181	1813			
22:00	63	120	581	720	1421	59.2	2427.5	4181	1753			
23:00	64	120	581	720	1421	59.2	2486.8	4181	1694			
0:00	65	120	581	720	1421	59.2	2546.0	4181	1635			
1:00	66	120	581	720	1421	59.2	2605.2	4181	1576			

Daylight Hours
Darkness Hours
First Operational Period
Second Operational Period
Third Operational Period

TSC = Total Storage Capacity

Table 1.6-3 Oil Recovery Summary

	Amount Recovered/Retained (bbls)
Recovered from Water	238
Recovered from Land	2,573
20% Retained in Soil	703
Total RPS	3,514

1.7 Nonmechanical Response Options

18 AAC 75.425(e)(1)(G) NONMECHANICAL RESPONSE OPTIONS - if applicable, a description of actions to be taken to obtain the necessary permits and approvals to initiate dispersant application, in situ burning, or other nonmechanical response options, the basis for determining the conditions or circumstances under which these options will be used, and how the nonmechanical response options will be implemented, including a description of all required equipment and personnel.

DW does not plan to use a nonmechanical response. However, STAR Manual Part IV covers dispersant and in-situ burning tactics should either become necessary. See Section 3.11 of this CPLAN for a link to the STAR Manual.

1.8 Facility Diagrams

18 AAC 75.425(e)(1)(H) FACILITY DIAGRAM - a plan diagram of the facility for reference in conducting emergency response operations, with locations of response equipment and other features pertinent to the response plan clearly marked, including surrounding topography, roads, air transportation and other transportation access, location and bathymetry of adjacent water bodies, mooring areas, oil transfer locations, pipelines, control stations, drip pans and drainage of drip pans, and a representation of the distance and gradients to surface water for an operation located on land, by topographic map, aerial photographs, or other means.

Table 1.8-1 Facility Drawings

Figure Number	Drawing Description
1.8-1	General Vicinity Map
1.8-2	Facility Site Layout
1.8-3	Tank Farm Site Layout and Drainage
1.8-4	Proximity to Haines Area Water
1.8-5	Secondary Containment Area Measurements

Figure 1.8-1 General Vicinity Map

Figure 1.8-1 General Vicinity Map

Current to: 10/20/2022
Author: Integrity Environmental LLC
http://integrity-env.com

Haines Bulk Facility
Delta Western, LLC
Within: Sec. 10, T. 30 S., R. 59 E.,
Copper River Meridian, Alaska.
Bulk Plant: 59 16' 50.055" N 135 28' 6.22"W
USGS 63K Quad: Skagway B-2
Coordinate System: NAD 1983 Alaska Albers

- Bulk Facility and Lutak Dock
- USGS Topography Map
- Township
- Section

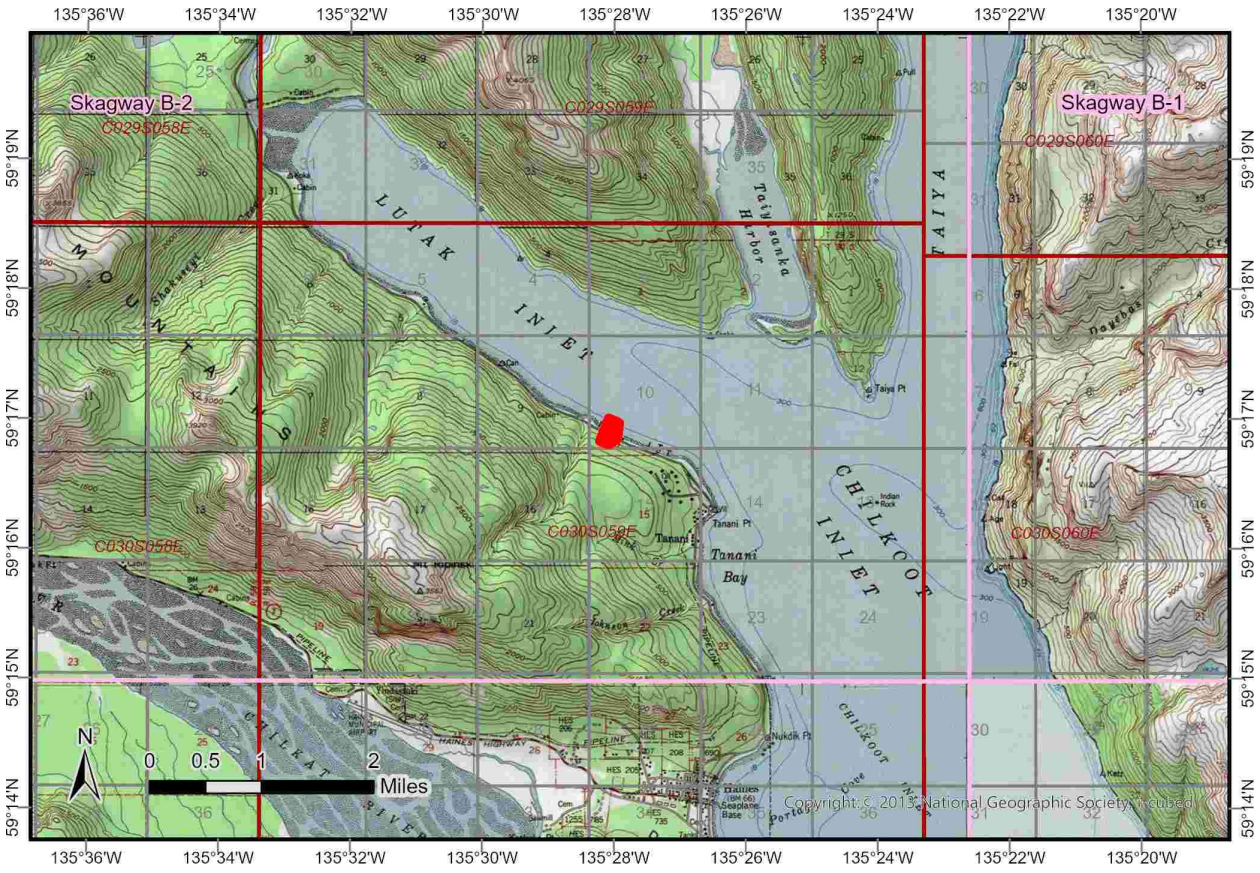


Figure 1.8-2 Facility Site Layout

Figure 1.8-2 Facility Site Layout

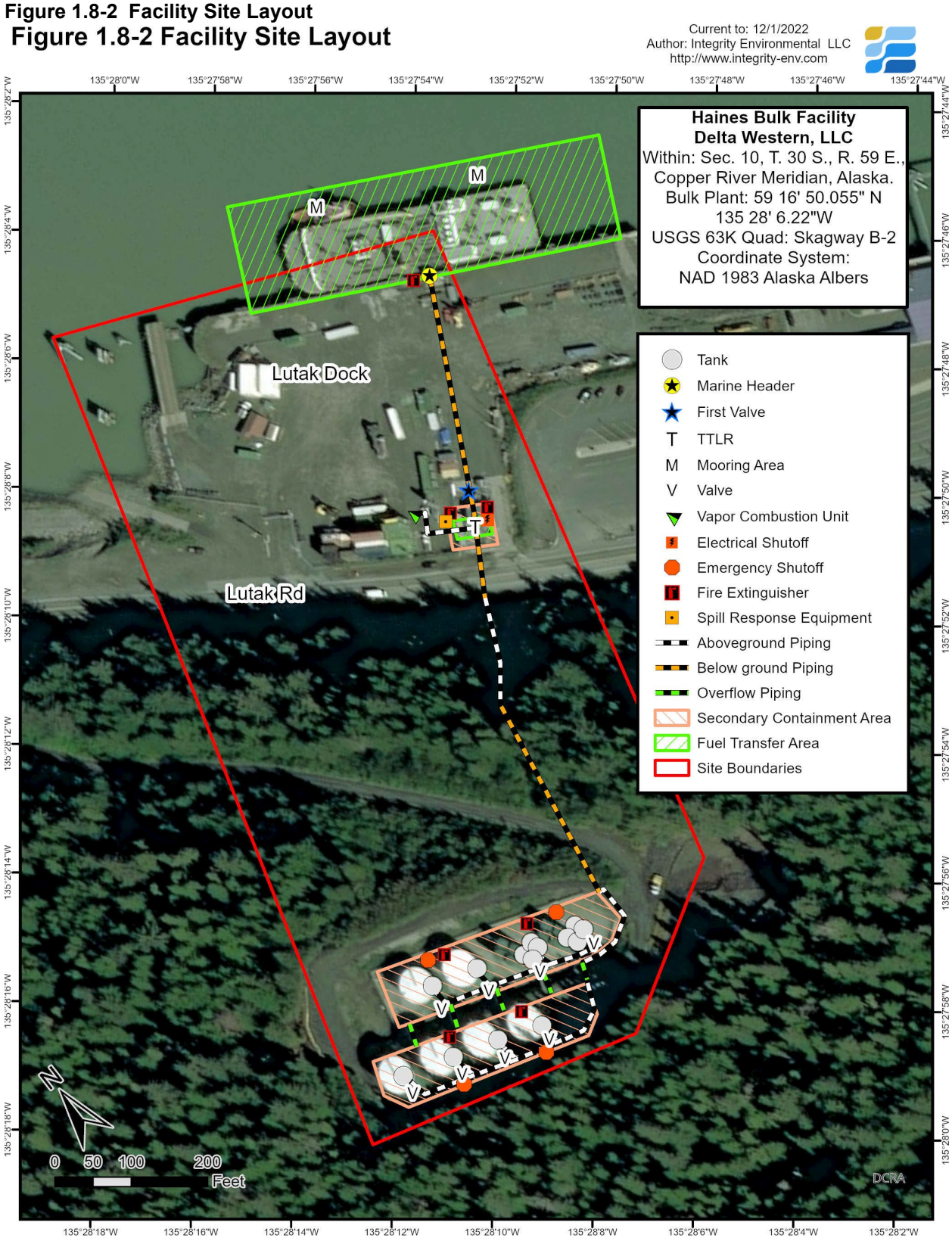


Figure 1.8-3 Tank Farm Site Layout and Drainage

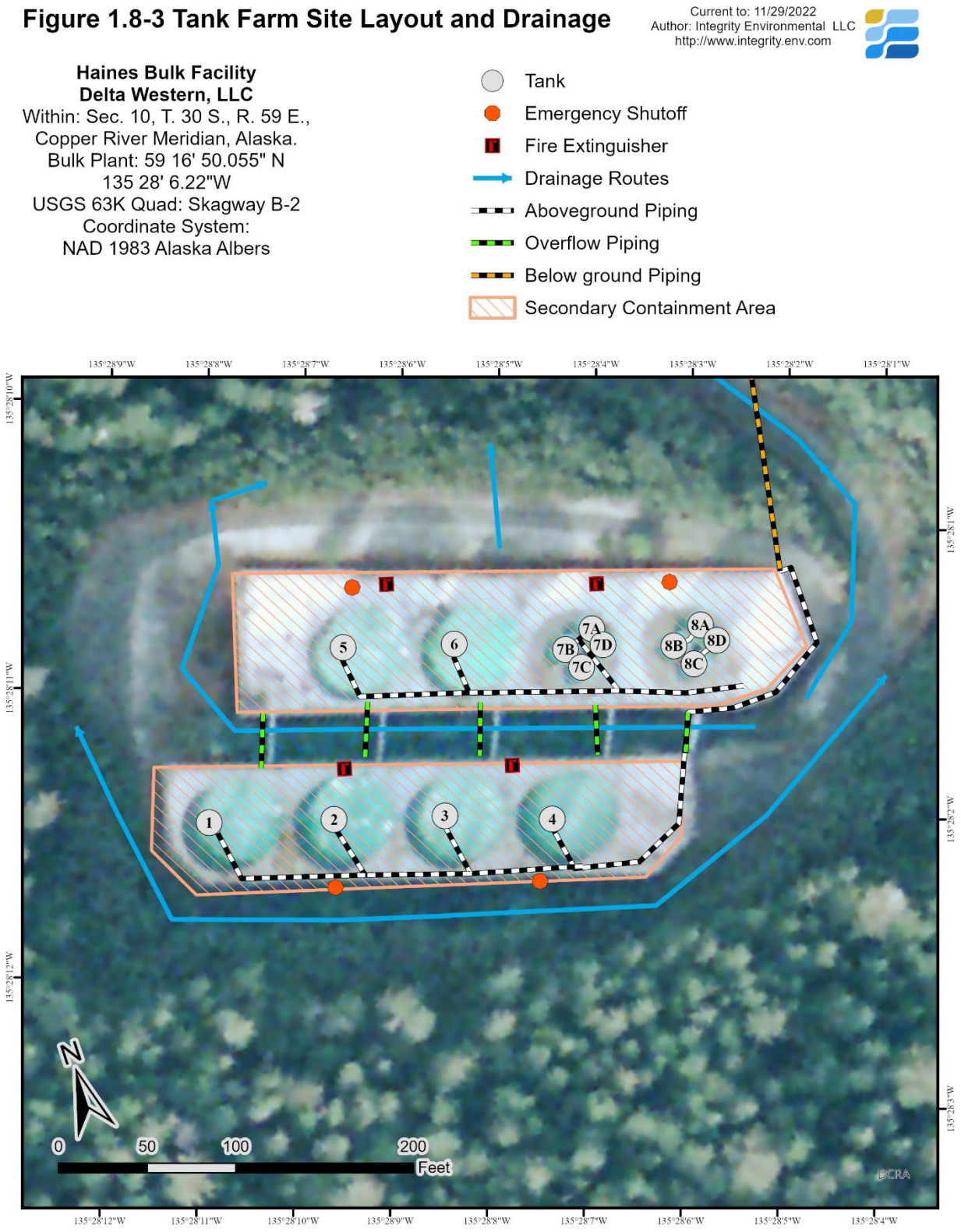


Figure 1.8-4 Proximity to Haines Area Water

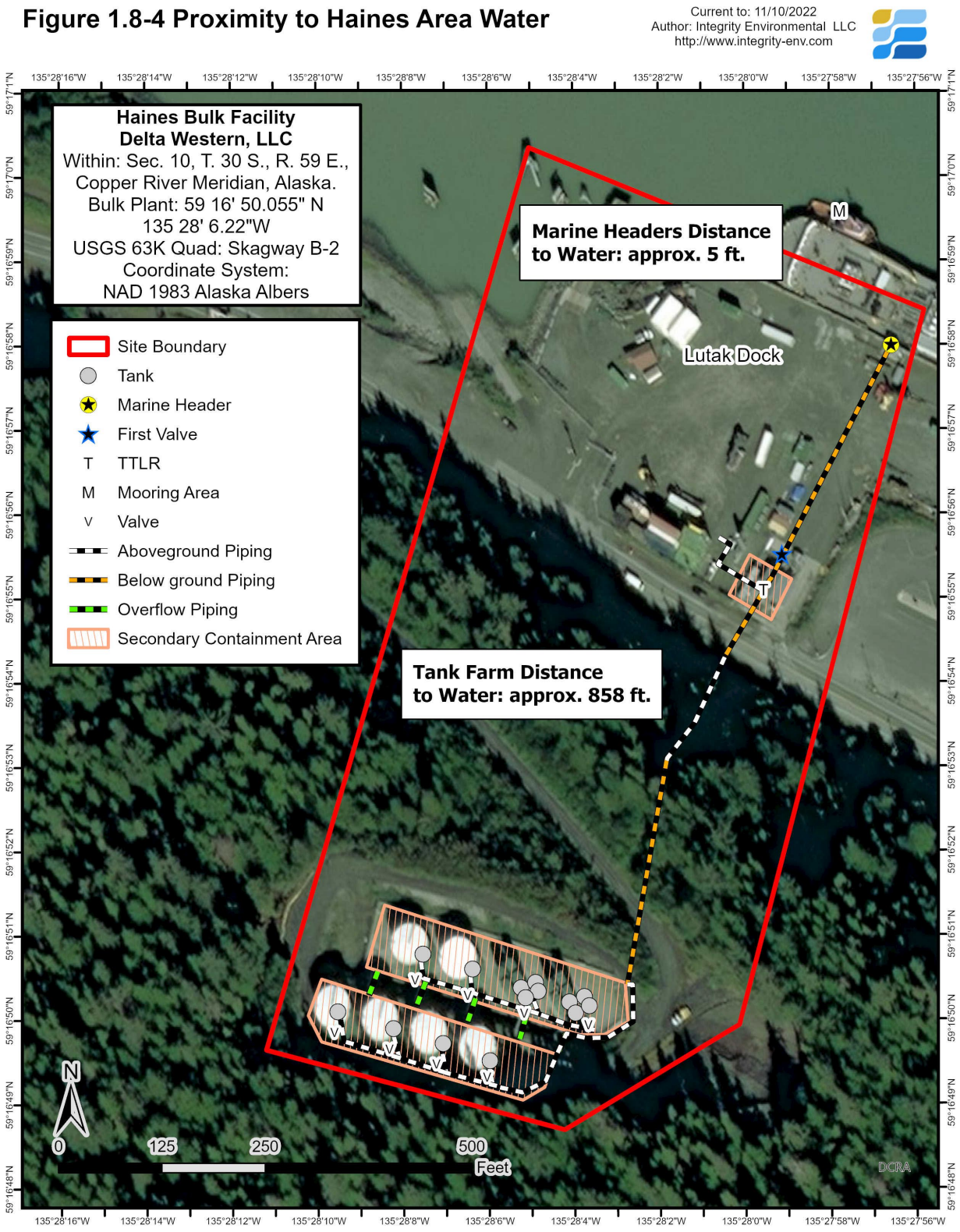


Figure 1.8-5 Secondary Containment Area Measurements

Figure 1.8-5 Secondary Containment Area Measurements

Current to: 11/10/2022
Author: Integrity Environmental LLC
http://www.integrity.env.com

Haines Bulk Facility
Delta Western, LLC
Within: Sec. 10, T. 30 S., R. 59 E.,
Copper River Meridian, Alaska.
Bulk Plant: 59 16' 50.055" N
135 28' 6.22"W
USGS 63K Quad: Skagway B-2
Coordinate System:
NAD 1983 Alaska Albers

Secondary Containment Area

Note: Measurements based on 1990 SCA drawing prepared by Dryden Consulting & LaRue Engineers Inc.

2 PREVENTION PLAN

18 AAC 75.425(e)(2) **PART 2 PREVENTION PLAN: - The prevention plan must include a detailed description of all oil discharge prevention measures and policies employed at the facility, vessel, or operation, with reference to the specific oil discharge risks involved. The prevention plan must describe how the applicant meets all the applicable requirements of 18 AAC 75.005 - 18 AAC 75.085. The prevention plan may be submitted as a separate volume, and must include, at a minimum, the following information:**

The Prevention Plan is provided in the following subsections.

2.1 Discharge Prevention Programs

18 AAC 75.425(e)(2)(A) **DISCHARGE PREVENTION PROGRAMS - a description and schedule of regular oil discharge prevention, inspection, and maintenance programs in place at the facility or operation, including**

DW's prevention programs are described in the following subsections and include:

- Oil Discharge Prevention Training Program required by 18 AAC 75.020(a)
- Substance Abuse and Medical Monitoring Programs required by 18 AAC 75.007(e)
- Security and Surveillance Program required by 18 AAC 75.007(f)
- Transfer Procedures required by 18 AAC 75.025
- Oil Storage Tanks required by 18 AAC 75.065 and 066
- Secondary Containment Areas (SCAs) required by 18 AAC 75.075
- Facility Piping required by 18 AAC 75.080

2.1.1 Oil Discharge Prevention Training Programs

18 AAC 75.020 OIL DISCHARGE PREVENTION TRAINING PROGRAMS required by:

(a)The owner or operator shall have in place personnel training programs designed to ensure that all personnel with job duties directly involving inspection, maintenance, or operation of oil storage and transfer equipment regulated under 18 AAC 75.005 - 18 AAC 75.085 are appropriately and regularly trained regarding company and state oil pollution prevention measures that are applicable to each position's duties.

(b) Personnel training programs must include:

(1) a listing of each position with job duties described in (a) of this section, and the training and level of knowledge appropriate to that position;

(2) a listing of any licenses, certifications, or other prerequisites needed to hold each position listed in (1) of this subsection.

(3) a listing of training objectives and the means of achieving them, including training subjects, training schedules, frequency, and type.

(c) Completion of training required by this subsection shall be verified by

(1) a statement, signed and dated by each participant, listing the course or program content;

(2) shipboard records verified by the vessel master; or

(3) computerized records verified by the owner or operator.

DW has a training program for all personnel. This standardized program allows for DW personnel from other facilities to fit into a response at a facility other than that which they are based. Training is assigned based on job position and responsibilities. The training program, as it relates to this CPLAN is summarized below.

The table on the following page provides a list of key job roles, associated duties, prerequisites, and the prevention training objectives for each position.

Table 2.1.1-1 Key Job Roles & Duties

Key Jobs	Duties	Prerequisites	Prevention Training Objectives
Facility Manager	Supervise, direct facility operations including barge, truck, and marine fuel transfers and opening/closing of the facility	Knowledge of ADEC, CG, EPA, and OSHA regulations; 24 hr. HAZWOPER	Recognize and correct unsafe conditions and eliminate spill potentials and equipment failure. Train onsite oil-handling personnel. Direct and follow response plans.
Facility Operator	Conduct barge, bulk fuel transfers, open, close bulk facility, deliver marine fuel	Knowledge of ADEC, CG, EPA, OSHA regulations; 24 hr. HAZWOPER, CPlan and Ops manual knowledge, PIC	Recognize and correct unsafe conditions and eliminate spill potentials and equipment failure. Inspections, spill prevention, fuel transfers.
Laborer	Support onsite personnel with duties as assigned	Hazardous communications or 8 hr. HAZWOPER	Recognize and correct unsafe conditions and eliminate spill potentials and equipment failure. Follow response plans.
Driver/Dock Attendant	Conduct barge and bulk fuel transfers, open and close facility, deliver marine fuel; inspect, maintain and fill truck; deliver oil/non-marine fuel	Knowledge of ADEC, CG, EPA, OSHA, and DOT regs; 24hr. HAZWOPER; CDL	Recognize and correct unsafe conditions and eliminate spill potentials and equipment failure. Truck maintenance and operation, spill prevention, fuel transfers.

The table below includes a summary of DW's spill prevention training program.

Table 2.1.1-2 DW Spill Prevention Training Program

Spill Prevention for inspection, operation and maintenance of oil storage and transfer equipment	Initial Training	Minimum Frequency	Manager/Supervisor	Facility Operator	Laborer	Driver/Dock Attendant
On the Job Orientation & Training	P	I	X	X	X	X
Spill Prevention	P	A	X	X	X	X
Oil Transfer Procedures	P	I	X	X		X
Facility (Fixed or Mobile) Inspection Procedures	P	I	X			X
Substance Abuse Recognition	P	2	X			X
Hazardous Communications	1	5	X	X	X	X
HAZWOPER as applicable to job	P	A	X	X	*	X
Lock Out Tag Out	1	3	X		*	X
Forklift Operations if required to operate forklift	P	3	X	X		X
Materials Handling if required	P	3	X	X	*	X

Notes:
Initial Training: 1=first day, P=Prior to use/exposure/assignment
Minimum Frequency/Recurrence: A=annual, I=initial, 2=two years, 3=three years, 5=five years
* - required if designated

All prevention training is accomplished through a combination of classroom training, on the job training, and in-house training.

Training is verified by record keeping. Training is recorded on a form with the name and date of the training and a summary of the training course. The form will be signed by each participant. Records are maintained through normal business processes for five years.

2.1.2 Substance Abuse and Medical Monitoring Programs

18 AAC 75.425(e)(2)(A)(ii)	**SUBSTANCE ABUSE AND MEDICAL MONITORING PROGRAMS required by 18 AAC 75.007(e)(ii).**
18 AAC 75.007(e)(ii)	**The owner or operator shall have in place programs designed to ensure that each drill operator, each person who has navigational, towline, security, or maintenance duties, and any other person directly responsible for an activity that might result in a violation of this chapter is free of substance-abuse or medical conditions that would impair that person's ability to do that person's job. The requirements of this section may be met.**

The DW substance abuse program applies to personnel who have maintenance, security or other safety sensitive duties or activities that might result in a discharge of oil. The program meets applicable federal DOT drug and alcohol testing requirements for regulated personnel. Testing includes pre-placement, post-accident, reasonable suspicion, random, return to work, and follow-up as required by applicable regulations. Compliance with the provisions of the program is supervised by Human Resources. In the event of an incident, Human Resources will ensure that all required testing is performed according to regulations.

For medical monitoring, DW may, at its expense and in its discretion, require personnel to undergo a physical examination by a licensed physician for legitimate work-related reasons. All DW personnel holding a CDL shall undergo all medical tests and examinations as required by their license.

2.1.3 Security and Surveillance Programs

18 AAC 75.425(e)(2)(A)(iii)	**Security and surveillance programs required by 18 AAC 75.007(f).**
18 AAC 75.007(f)	**The owner or operator shall provide security measures and surveillance appropriate to each component of the operation to minimize the risk of vandalism, sabotage, and unauthorized entry.**

Personnel are on site during normal business hours to monitor access to the facility.

The facility has permanent lighting sufficient to allow visual surveillance of the facility in hours of darkness including potential releases of oil or acts of vandalism.

Access to the start-stop stations at the TTLR is limited to authorized personnel. Electricity to the pumps is shut off at the end of business hours with a shut-off switch located in the Electrical Control Building at the TTLR.

The tank farm and TTLR are fenced. Entrance gates are closed and locked when the facility is unattended.

An emergency stop button is located at each load station at the TTLR and an emergency shutoff valve is on each pipeline. Cargo valves for each tank are closed and locked except during barge receipt when transfer personnel are present. Electronic and manual valves are opened by the authorized personnel as described above. If the computer system is down or electricity is lost, fuel cannot be dispensed at the truck rack.

Each storage tank has a valve that is closed and locked at the close of business.

The following actions are taken for the closing of the facility:

1. Inspect product lines, valves, and connections for any possible leaks.
2. Close and lock all valves.
3. Ensure buildings are secured.
4. Shutoff electrical power to pumps in the control room of the office.
5. Close and lock gates.
6. Ensure that emergency telephone information is properly posted.

The facility has an approved Facility Security Plan (FSP) on file with the CG. That plan lists facility security procedures. Due to the sensitive nature of that information, the FSP is not available for distribution, but is housed onsite and available for CG inspection.

2.1.4 Transfer Requirements

18 AAC 75.025 TRANSFER REQUIREMENTS

(a) The owner or operator of an oil terminal facility, railroad, tank vessel, or oil barge shall take all appropriate measures to prevent spills or overfilling during a transfer of oil, including reduced loading rates at the beginning and end of a transfer.

(c) Except for crude oil washing, tank cleaning operations may not be conducted during cargo offloading.

(d) The owner or operator shall ensure that each person involved in a transfer is capable of clearly communicating orders to stop a transfer at any time during the transfer.

(e) A positive means must be provided to stop a transfer in the shortest possible time consistent with the best commercially available technology.

DW personnel take all appropriate measures to prevent spills or overfilling during a transfer of oil including:

- Reducing loading rates at the beginning and end of a transfer
- Not conducting tank cleaning operations on tanks involved in cargo transfers

All transfer personnel are capable of clearly communicating orders to stop a transfer at any time during the transfer by voice or intrinsically safe radios. Communications are continuously maintained throughout the duration of the transfer. If communications fail, the transfer is stopped. Any person can initiate stopping a transfer of oil.

Given below is the length of time it would take to stop a transfer at each applicable location at the facility:

Table 2.1.4-1 Estimation of Time to Stop a Transfer

Valve Location	Time to Stop Transfer from Dock (estimated)
Dock	Immediately
TTLR	2 minutes
First valve inside SCA	3 minutes
Tank valves	Maximum 15 minutes

Transfer personnel can utilize the emergency shut offs located here:

- If receiving from a vessel, first request the vessel shut down pumping prior to closing facility valves.

- Fuel Dock: first close the header valve, next close the truck rack valve, then close the first valve inside SCA, then close the tank valve.
- TTLR: first press the emergency stop button at the load station (an emergency stop is located at each station). Then close the pipeline ball valve and the electronic tank valve, if the electronic valve does not work all tanks can be closed manually.

2.1.4.1 Transfer Procedures to/from Areas Not Protected by Secondary Containment

18 AAC 75.025(f) **Before beginning a transfer to or from an area not protected by secondary containment, the owner or operator shall ensure that all valves in the transfer system have been checked to ensure that they are in the correct position, and that all manifolds not in use are blank flanged or capped. Where feasible, the owner or operator shall also inspect for damage or defects all piping and hoses used in the transfer before and at least once during each transfer.**

For transfers that include an area not protected by secondary containment, facility personnel check to ensure:

- All valves in the transfer system are in the correct position
- All headers not being used are blank flanged or capped
- Piping and hoses used in the transfer are visually inspected before and at least once during each transfer for damage or defects

The following procedures for the service transfers system and marine cargo system are followed.

Service Transfer System:	Facility personnel responsible for tank farms open up to four product tank service valves, open applicable beach valves, while visually checking for anomalies including damage and or weeps/leaks to transfer system. This takes approximately 20-30 minutes.
Marine Cargo System:	Facility personnel responsible for tank farms obtain cargo information from Person in Charge (PIC) and properly aligns valving for required cargo flow; observes tank auto gauges; while visually checking for anomalies including damage and or weeps/leaks to transfer system. Proceed to dock to verify with PIC.

When all is ready, proceed to designated tank(s) to open tank valve, notify header watch ready to receive and wait for transfer to begin. Once transfer begins check tank auto

gauge(s) to verify product is flowing to designated tank(s). When flow is verified, notify PIC flow pressure can be increased. This takes approximately 45 minutes. Facility personnel continue to monitor the transfer system for problems during the transfer.

2.1.4.2 Truck Rack Loading/Unloading Procedures

18 AAC 75.025(g) **The lowermost drain and all outlets of any tank car or tank truck must be visually examined for leakage before filling and before departure. All tank car or tank truck manifolds must be blank flanged or capped, and valves must be secured before leaving the transfer area.**

The truck rack is designed for "bottom loading". All truck loading is conducted by facility operators. Loading procedures are:

- No smoking in this area
- No repair or adjustment of vehicle during loading
- Personnel may not stay in cab during loading
- In the event of a spill, stop all transfers immediately and activate emergency shutdown switch, notify office and begin response

Pre-Transfer

- Turn off engine and electronic devices (ignition sources) if not intrinsically safe
- Set parking brake
- Chock wheels to prevent movement
- An inspection is made to verify everything is in order including the lowermost drain and all outlets of any tank truck must be visually examined for leakage before filling.
- Connect grounding cable
- Connect vapor recovery hose connection for product being loaded
- Verify content and capacity of tank compartment(s) to be loaded
- Connect product loading hose, or loading arm
- Commence loading

Transfer

- Monitor transfer. Verify load control system reduces flow rate and ceases transfer when complete.
- Tank is filled to predetermined level
- Shut transfer valves at completion of loading

Completion of loading

- Disconnect loading hose/arm
- Disconnect vapor recovery hose and ground cable

- Check truck, fittings, hoses and loading area for oil discharges
- Conduct a walk around the truck visually checking the lowermost drain and all outlets of any tank truck to ensure they are not leaking before departure
- All tank truck manifolds must be blank flanged or capped and valves must be secured before leaving the transfer area
- Remove wheel chocks and replace on rack

2.1.4.3 Marine Oil Transfer Procedures

18 AAC 75.025(h) **All aboveground transfer piping that is used to transfer oil to or from docks or vessels is visually checked before and during each transfer or at least monthly by facility personnel. Monthly visual inspections are documented. See (f) above for transfers outside of SCA.**

The following procedures are followed for marine transfers.

Preparation for an Oil Transfer

- Establish security, keep unauthorized persons and vehicles away
- Prepare emergency response equipment, post signage
- Prepare transfer and sampling equipment, gauge tanks
- Visually inspect hoses, test overfill alarms and communications equipment

Vessel Arrival

- Complete ADEC CPLAN Verification Log with vessel operator (when applicable)
- Verify shipping papers, gauge barge cargo compartments to verify quantities of product to be received and test products as required for quality or establish the type and quantity of oil the vessel is requesting

Transfer Conference

- The facility and vessel persons in charge of the transfer will conduct a conference before the transfer begins to ensure the delivering and receiving parties understand the following:
    1. The type of the product(s) to be transferred
    2. The sequence of oil product(s) to be transferred
    3. The transfer rate and/or pressure
    4. Transfer personnel names or title and location
    5. Details of the transferring and receiving systems
    6. The process to ensure the transfer pressure does not exceed the limits of the transfer system
    7. Critical stages of the transfer operation

8. Rules that apply to the transfer of oil
9. Emergency procedures
10. Watch or shift arrangement
11. Transfer shutdown procedures
12. Predetermined radio frequency for communications during the transfer
13. Both persons in charge must agree to begin the transfer operation

Begin the Transfer

- The receiving person in charge (facility or vessel) must order the commencement of pumping to the delivering person in charge once all connections are made and ensured ready to receive oil
- Connect hoses
- Open valves, check for leaks (header, valves, tanks, surrounding waters)
- Start the transfer slowly to ensure cargo is entering the correct tank, then pumping rate can then be increased

Transferring and Completion of Transfer

- Conduct ongoing checks for leaks (header, valves, tanks surrounding waters)
- Regularly check liquid level gauges at tanks
- Decrease delivery rate for topping off tanks
- Closely monitor tanks when topping off to prevent overfills
- Drain delivery hose and secure hose

2.1.5 Oil Storage Tanks

The following sections address requirements that apply to field constructed aboveground oil storage tanks (FCAST) and shop fabricated oil storage tanks (SFAST)

2.1.5.1 Field Constructed Aboveground Oil Storage Tanks

18 AAC 75.065(a)

Unless the owner or operator must comply with a more stringent requirement set out in this section, the owner or operator of an oil terminal, crude oil pipeline, exploration, or production facility shall maintain and inspect each field-constructed aboveground oil storage tank consistent with the requirements, as appropriate of American Petroleum Institute's (API)

(1) Tank Inspection, Repair, Alteration, and Reconstruction, or

(2) Recommended Practice for Setting, Maintenance, Inspection, Operation, and Repair of Tanks in Production Service.

The table on the following page contains details on the FCAST tanks located at the facility.

Table 2.1.5.1-1 FCAST Tanks

Tank #	Year Built	Tank Design	Base Type	Construction Standard	Dimensions (diameter/ height)	Capacity (gallons)	Product Name	Condition
1	1990	V	Concrete Pad	API 650	47'/40'	0	NA	OOS
2	1990	V, L	Concrete Pad	API 650	47'/40'	517,797	Diesel	SS
3	1990	V, L	Concrete Pad	API 650	47'/40'	517,797	Diesel	SS
4	1991	V, L	Concrete Pad	API 650	47'/40'	517,797	Diesel	SS
5	1990	V	Concrete Pad	API 650	47'/40'	517,797	Diesel	SS
6	1991	V	Concrete Pad	API 650	47'/40'	517,797	Diesel	SS
					FCAST Total:	2,588,985		
					SFAST Total:	236,572		
					Piping Total:	4,065		
					Facility Total:	2,829,622		

Notes:

- Capacity and height sourced from strapping charts by Saybolt. Inc. (originals)
- Diameter sourced from tank data plates and API 653 reports.
- Tank 1 was formally taken out of service in May 2021; thus, the total capacity is now shown as zero.
- V = Vertical
- L= Lined (internal bottom lining)
- SS = Suitable for Service
- OOS = Out of Service
- Base = Foundation Type

FCAST Inspection Intervals

18 AAC 75.065(b) **Inspection intervals for a field constructed aboveground oil storage tank**

DW maintains and inspects each FCAST consistent with the requirements, as appropriate, of the American Petroleum Institute's API 653 Tank Inspection, Repair, Alteration, and Reconstruction, or Recommended Practice for Setting, Maintenance, Inspection, Operation, and Repair of Tanks in Production Service.

Formal inspection intervals for a FCAST are provided in the API 653 inspection report provided by the inspector.

FCAST Records and Documentation

18 AAC 75.065(d) **Records and documentation**

(1) required by this section shall be maintained by the owner or operator, except as provide in (2) of this subsection, for the service life of the tank and shall be provided to the department for inspection and copying upon request.

(2) of inspections required as specified in Section 6.3.1 of *Tank Inspection, Repair, Alteration, and Reconstruction* (API 653), adopted by reference in (a) of this section, shall be maintained by the owner or operator for five years and shall be provided to the department for inspection and copying upon request.

A monthly visual tank inspection is documented for in-service tanks. A monthly visual inspection of Tanks 2 through 6 aboveground accessible components is documented. Deficiencies found during monthly inspections are scheduled for repair and recorded on the Monthly Facility Inspection Form.

Records and documentation are maintained by DW for the service life of the tank per API 653. Monthly inspections are maintained for five years. All tank records are provided to the ADEC upon request.

Table 2.1.5.1-2 API 653 and STI SP001 Inspections

Tank #	Inspection Type	Last Internal	Next Internal	Last External	Next External
2	API 653	2020	2023	2020	2025
3	API 653	2020	2030	2020	2025
4	API 653	2020	2030	2020	2025
5	API 653	2020	2030	2020	2025
6	API 653	2018	2028	2018	2023
7A*	STI SP001	N/A	N/A	2020	2025
7B*	STI SP001	N/A	N/A	2020	2025
7C*	STI SP001	N/A	N/A	2020	2025
7D*	STI SP001	N/A	N/A	2020	2025
8A*	STI SP001	N/A	N/A	2020	2025
8B*	STI SP001	N/A	N/A	2020	2025
8C*	STI SP001	N/A	N/A	2020	2025
8D*	STI SP001	N/A	N/A	2020	2025

* Indicates shop fabricated tank inspected to STI SP001.

Tank 1 is out of service and would not be used except in an emergency only situation. As such, this tank is periodically inspected to ensure continued suitability for use in this capacity but is not subject to a formal API 653 inspection and thus is not included in the table above. Tank 1 was last inspected in 2020.

FCAST Repair Notifications

18 AAC 75.065(e) **The owner or operator shall notify the department**

(1) as soon as practical before a field-constructed aboveground oil storage tank undergoes major repair or major alteration, as defined in Section 12.3.1.2 of Tank Inspection, Repair, Alternation, and Reconstruction, (API 653), adopted by reference in (a) of this section; and

(2) before a field-constructed aboveground oil storage tank resumes service following major repair or alteration as defined in Section 12.3.1.2 of Tank Inspection, Repair, Alteration, and Reconstruction, (API 653), adopted by reference in (a) of this section.

DW will notify ADEC as soon as practical before making any major repair or alternation to a field constructed tank and before returning a field constructed tank to service following major repairs or alterations as defined in Section 12.3.1.2 (API 653).

FCAST Internal Lining Systems

18 AAC 75.065(g) **An internal lining system installed and used to control corrosion or to meet the requirements of (h) of this section, must be installed in accordance with American Petroleum Institute's (API).**

(1) Lining of Aboveground Petroleum Tank Bottoms, First Edition, 1991, (API RP 652) adopted by reference, for internal lining systems installed before December 30, 2008; or

(2) Lining of Aboveground Petroleum Storage Tank Bottoms, Third Edition, October 2005 (API RP 652), adopted by reference, for internal lining systems installed after December 30, 2008.

Internal lining system are installed and used to control corrosion or to meet the requirements of 18 AAC 75.065(h) and are installed in accordance with the API: Lining of Aboveground Petroleum Storage Tank Bottoms.

Internal linings consistent with API RP 652 – Lining of Aboveground Storage Tank Bottoms were installed in Tanks 2 and 3 in October 2020 and in Tank 4 in 2021.

FCAST Leak Detection for Tanks Placed in Service Before May 14, 1992

18 AAC 75.065(h)

An owner or operator of an installation placed in service before May 14, 1992 shall (1) equip each field-constructed aboveground oil storage tank with one or more of the following:

(A) a leak detection system that an observer from outside the tank can use to detect leaks in the bottom of the tank,

(B) cathodic protection in accordance with the American Petroleum Institute's (API) *Cathodic Protection of Aboveground Petroleum Storage Tanks*,

(C) a thick film liner in accordance with *Lining of Aboveground Petroleum Storage Tank Bottoms*; First Edition, 1991 (API R 652), (D) another leak detection or spill prevention system approved by the department.

The vertical FCAST tanks are constructed on individual raised concrete pads. The tanks do not come in contact with any soils and no paths of conductivity exist between the tank bottoms and source of corrosion.

For leak detection, the raised concrete pad is crowned at the center and drains to the perimeter. Any discharge from the tank bottom, would be detected visually during the routine visual inspection.

FCAST High Level Alarms

18 AAC 75.065(k)

In addition to the applicable requirements of 18 AAC 75.025, and except as required in (1) of this subsection, the owner or operator of a field constructed aboveground oil storage tank shall ensure that one or more of the following means of preventing overfilling is provided:

(1) high liquid level alarms
(2) high liquid level automatic pump shutoff devices;
(3) a means of immediately determining the liquid level of each bulk storage tank,
(4) a system approved by the department which will immediately notify the operator of high liquid levels.

Each tank is equipped with an independent automatic overfill alarm (Pneumercator, LC2000-series) using liquid level floats (Shand & Jurs, Model 92021) to activate audible alarms. The main control panel and alarm horn for this system is located outside the SCA near the entrance gate.

A liquid level float switch is set inside each of the tanks inside the tank farm. The liquid level float for fixed roof tanks is set at the tank max fill height, which is eight inches below the roof ring level. Once liquid reaches this level, the audible alarm is activated again. Facility personnel can reset the alarm system to turn off the audible alarm.

A self-contained, portable, intrinsically safe Outalarm Model A-100 is also available as a secondary method for use at the facility to measure liquid levels for tanks, tank trucks and marine barges. The device provides high intensity audible and flashing visual warning alarms.

Additional overfill protection is provided by having transfer personnel monitor the tank during product receipts. Transfer person physically stays with the tank during topping off (to safe fill level).

FCAST Overfill Protection

18 AAC 75.065(l) **Overfill protection devices must be tested before each transfer operation or monthly, whichever is less frequent. If monthly testing would necessitate interrupting the operation of a system subject to continuous flow, the owner or operator may substitute monthly inspection and annual testing for the monthly testing of overfill protection devices.**

Shand and Jurs tank level gauges show the liquid level of the contents of the tank and are designed to be easily read by the facility personnel from outside the tank at ground level.

On a monthly basis tank level gauge readings are compared with manual hand tape gauging for each tank to test the confirm the accuracy of the gauge system. Additionally, transfer personnel test the fixed system by manually raising the float to stimulate an overflow condition.

FCAST Out of Service Tanks

18 AAC 75.065(o) **A field-constructed aboveground oil storage tank removed from service for more than one year must be free of accumulated oil, marked with the words "Out of Service" and the date taken out of service, secured in a manner to prevent unauthorized use, and either blank flanged or otherwise disconnected from facility piping. The owner or operator shall notify the department when a tank is removed from service and when the actions required by this subsection are completed.**

A FCAST "removed from service" (not in regular use, nor being maintained or inspected) for more than one year is:

- Free of accumulated oil
- Marked with the words "out of service" and with the date taken out of service
- Secured to prevent unauthorized use
- Blank flanged or disconnected from the facility piping
- Notify ADEC when removed from service and above actions are complete

2.1.5.2 Shop Fabricated Oil Storage Tanks

18 AAC 75.066

(a) The owner or operator of a shop-fabricated aboveground oil storage tank placed in service:

(1) on or before December 30, 2008 shall meet the requirements of (f) - (h) of this section;

(2) after December 30, 2008 shall meet the requirements of this section.

(b) Unless the owner or operator must comply with a more stringent requirement set out in this section, the owner or operator shall ensure that

(1) one of the following standards is used for the design and construction of each shop-fabricated aboveground oil storage tank:

(A) UL 142

(B) API 650

(C) API 12F

(D) STI F921-03

(E) UL 2085.

(2) the design of a shop-fabricated above ground oil storage tank is certified by a registered engineer and approved by the department as equivalent to a design for which a standard listed in (1) of this subsection is used.

This section covers shop fabricated tanks. The table on the following page contains details on the SFAST tanks located at the facility.

One of the following standards is used for the design and construction of each SFAST at the facility:

- Underwriters Laboratories' UL142
- Appendix J of API650
- the API Spec 12F
- the Steel Tank Institute's STI F921-03
- Underwriters Laboratories' UL 2085
- the design is certified by a registered engineer and approved by the ADEC

Table 2.1.5.2-1 SFAST Tanks

Tank #	Year Built	Placed in Service	Tank Design	Base Type	Construction Standard	Dimensions (diameter / height)	Capacity (gallons)	Product Name	Condition
7A	1987	2020	V, W	Concrete Pad	UL142	12'/35'	30,000	Diesel	Good
7B	1987	2020	V, W	Concrete Pad	UL142	12'/35'	30,000	Diesel	Good
7C	1987	2020	V, W	Concrete Pad	UL 142	12'/35'	30,000	Diesel	Good
7D	1987	2020	V, W	Concrete Pad	UL 142	12'/35'	30,000	Diesel	Good
8A	1987	2020	V, W, IFR	Concrete Pad	UL 142	12'/35'	29,143	Gasoline	Good
8B	1987	2020	V, W, IFR	Concrete Pad	UL 142	12'/35'	29,143	Gasoline	Good
8C	1987	2020	V, W, IFR	Concrete Pad	UL 142	12'/35'	29,143	Gasoline	Good
8D	1987	2020	V, W, IFR	Concrete Pad	UL 142	12'/35'	29,143	Gasoline	Good
						Total:	236,572		

V = Vertical, W = Welded, UL = Underwriter's Laboratory, IFR = Internal Floating Roof

SFAST Maintenance and Inspection

18 AAC 75.066(f)

Unless the owner or operator must comply with a more stringent requirement set out in this section, the owner or operator of an oil terminal facility, crude oil pipeline, exploration facility, or production facility shall ensure that one of the following standards is used for the maintenance and inspection of shop-fabricated aboveground oil storage tank:

(1) STI SP001;

(2) API 653;

(3) another equivalent standard approved by the department.

DW maintains and inspects SFASTs as required by 18 AAC 75.066(f).

Monthly and annual visual inspections are conducted and documented by DW personnel who are familiar with the site and can identify changes or developing problems.

SFAST Discharge Prevention Devices

18 AAC 75.066(g)

In addition to the applicable requirements of 18 AAC 75.025, the owner or operator of a shop-fabricated aboveground oil storage tank

(1) shall ensure that the tank is equipped with one or more of the following means of preventing discharges:

(A) high liquid level alarms with signals that sound and display in a manner immediately recognizable by personnel conducting a transfer;

(B) high liquid level automatic pump shutoff devices set to stop flow at a predetermined tank content level;

(C) a means of immediately determining the liquid level of each bulk storage tank, if the liquid level is closely monitored during a transfer;

(D) a system approved by the department which will immediately notify the operator of high liquid levels; and (2) if the tank is placed in service after December 30, 2008, shall ensure that the tank is equipped, at each tank fill connection, with a fixed overfill spill containment system designed to

prevent a discharge when a transfer hose or pipe is detached from the tank fill pipe.

Tanks 7C and 7D are equipped with Morrison Brothers Adjustable Level Sensor with Alarm.

A self-contained, portable intrinsically safe Outalarm Model A-100 is also available for use at the facility to measure liquid levels for Tanks 7A and 7B, tank trucks, and marine barges; this device can also be used a secondary measure for Tanks 2 through 6. The device provides high intensity audible and flashing visual warning alarms. The overfill alarm systems are tested monthly.

Tanks 8A through 8D rely on personnel monitoring during filling. When these tanks are filled personnel remain at the top of the tank for the duration of the transfer and have gauging equipment and a means of immediately communicating with the vessel to stop the transfer. This process allows for a means of immediately determining the liquid level in each tank as required by 18 AAC 75.066(g)(1)(C).

SFAST Testing Discharge Prevention Devices

18 AAC 75.066(h) **The owner or operator of a shop-fabricated aboveground storage tank shall ensure that each discharge prevention device for the tank is tested before each transfer operation or monthly, whichever is less frequent. If monthly testing would necessitate interrupting the operation of a system subject to continuous flow, the owner or operator may substitute monthly inspection and annual testing for the monthly testing of overfill protection devices.**

Transfer personnel test the overfill alarm device for the tanks before each transfer operations and/or monthly, whichever is less frequent. The overfill alarm system is tested by manually pressing the button that raises the float to simulate an overflow condition.

2.1.6 Secondary Containment Areas

18 AAC 75.075 — **Secondary containment requirements for aboveground oil storage tanks.**

18 AAC 75.075(a) — **Onshore aboveground oil storage tanks must be located within a secondary containment area that has the capacity to hold the volume of the largest tank within the containment area, plus enough additional capacity to allow for local precipitation. Minimum secondary containment system requirements include:**

(1) berms, dikes, or retaining walls that are constructed to prevent the release of spilled oil from within the containment area; and

(2) with the exception of the area under a tank, components constructed of, or lined with, materials that are

(A)adequately resistant to damage by the products stored to maintain sufficient impermeability;

(B) resistant to damage from prevailing weather conditions; and

(C) sufficiently impermeable; and

(D) resistant to operational damage.

18 AAC 75.075(c) — **A secondary containment system must be maintained free of debris, vegetation, excessive accumulated water, or other materials or conditions that might interfere with the effectiveness of the system. Facility personnel shall visually check for the presence of oil leaks or spills within secondary containment areas during routine operations, and, unless precluded by safety concerns or weather conditions, shall conduct documented weekly inspections of secondary containment areas, including checking for**

(1) debris and vegetation,

(2) proper alignment and operation of drain valves,

(3) visible signs of oil leaks or spills; and

(4) defects or failures of the secondary containment system.

The tank farm SCAs are sized to contain the largest oil storage tank volume of 517,797 gallons (12,328.5 bbls) plus precipitation. The two SCAs are constructed of reinforced concrete with dike retaining walls and concrete floors. The internal surface areas are coated with a Polyshield HT 100 F spray in liner underlain by a geo-textile 250 weight woven polymer fabric, which were installed in October 2020. Operations in the tank farm SCA are restricted to prevent damage to the liner.

The upper SCA measures 35,280 net cubic feet or 263,894 gallons at a 30-inch wall height. The upper SCA is equipped with overflow pipes that lead to the lower SCA, the bottom of the overflow pipes are approximately 10.5 inches off the floor of the upper SCA, this equates to 12,348 cubic feet or 92,363 gallons. The lower SCA net capacity is 89,456 cubic feet or 669,331 gallons.

The onsite SCA is:

- Maintained free of debris, vegetation, excessive accumulated water, or other materials
- Visually checked for oil leaks or spills during routine operations, and
- Inspected weekly (form provided in Appendix A)

2.1.6.1 Secondary Containment Area Drainage

18 AAC 75.075(d)

Drainage of water accumulations from secondary containment areas that discharge directly to the land or waters of the state must be controlled by locally operated, positive close failsafe valves or other positive means to prevent a discharge. Valves must be kept closed and locked when not in use. The owner or operator shall inspect accumulated water before discharging it from a secondary containment area to ensure that no oil will be discharged and shall keep for five years a written record of each drainage operation and whether a sheen was present or not. A discharge of water to land is subject to a cleanup plan approved under 18 AAC 75.360, a corrective action plan approval under 18 AAC 78.260, or a wastewater discharge permit issued under 18 AAC 72. If the discharge of water from a secondary containment area is to surface waters or wetlands, either a permit under 18 AAC 72, a permit under 18 AAC 83, or a certified NPDES permit under 18 AAC 15.120 may be required.

In addition to the above, the following SCA related procedures are followed by facility personnel:

- All water drain valves are maintained in the closed and locked position when not in use
- Accumulated water is inspected for sheen before discharging it from SCAs
- Each de-watering is recorded on a log (form provided in Appendix A)
- Written de-watering records are maintained through normal business practices for five years including whether sheen was present or not, and an estimated volume of water discharged

Tank Farm SCA

There are sumps located in each SCA to enable stormwater to be removed through a pipe with a ball valve on the outlet; the facility may also utilize pumps and hoses, as needed. In either case, the operator must manually start and monitor the discharge of water. All SCA water without sheen is discharged to gravel.

TTLR SCA

The TTLR SCA drains into a below ground sump, which is pumped to an OWS before discharging to land. All discharges from the TTLR require an operator to manually operate the OWS, as the sump is lower in elevation and there is no valve on the sump.

2.1.6.2 Tank Truck Loading Area Secondary Containment Areas

18 AAC 75.075(g)

The owner or operator of rail tank car and tank truck loading areas and permanent unloading areas must ensure that those loading and unloading areas

(1) have a secondary containment system designed to contain the maximum capacity of any single compartment of the tank car or tank truck, including containment curbing and a trenching system or drains with drainage to a collection tank or device designed to handle a discharge;

(2) are paved, surfaced, or lined with sufficiently impermeable materials;

(3) are maintained free of debris, vegetation, excessive accumulated water or other materials or conditions that might interfere with the effectiveness of the system;

(4) have warning lights, warning signs, or a physical barrier system to prevent premature vehicular movement; and

(5) are visually inspected before any transfer operation or at least monthly.

The TTLR SCA consists of an impermeable concrete slab. Beneath each of the two loading areas is a drain that drains into a 2,500-gallon underground sump. The sump connects to a pump and a 5,000-gallon storage tank. The total TTLR containment is 7,500 gallons which is larger than any single compartment loaded (4,750 gallons). The sump is pumped into an OWS by DW employees and monitored for any presence of oil regularly, this process is also logged each time.

In addition to the procedures noted under Section 2.1.6, additional procedures that apply to the TTLR SCA include:

- Using tire chocks to prevent vehicle from moving during loading or unloading
- Visually inspecting the TTLR SCA system before any transfer operation or at least monthly

2.1.7 Facility Piping

18 AAC 75.080 Requirements for facility oil piping

(a) The owner or operator of an oil terminal, crude oil transmission pipeline, exploration facility, or production facility shall ensure that all facility oil piping associated with that facility meets the requirements of this section.

(b) The owner or operator shall maintain metallic facility oil piping containing oil in accordance with a written corrosion control program.

(c) Unless the owner or operator must comply with a more stringent requirement set out in this section, the owner or operator shall ensure that facility oil piping placed in service after December 30, 2008 is designed and constructed in accordance with specified standards;

(1) Process Piping, ASME B31.3-2004;

(2) ASME B31.4-2002;

(3) ASME B31.8-2003;

(4) another equivalent standard approved by ADEC.

DW maintains metallic facility oil piping containing oil in accordance with a corrosion control program, which is addressed below.

All piping was installed in 1990 and 1991 in accordance applicable standards as of the date of construction including API 1104, Welding of Pipelines and Related Facilities; applicable NACE Construction and Load Standards; applicable UBC load guidelines, safety factor 3; ANSI 150lb. Classification; and applicable portions of the National Fire Protection Association (NFPA). These segments of piping were installed with the applicable standard as listed in 18 AAC 75.080(c).

The following table tabulates the facility piping volume.

Table 2.1.7-1 Estimated Pipeline Length and Volume

Segment Description	Qty.	Diameter (inches)	Length (feet)	Gallons per Feet	Volume/Pipe (gallons)	Total (gallons)
Marine Cargo	3	6	600	1.4688	881	2,643
Marine Cargo	2	4	600	0.6528	392	784
TF Cargo	5	6	62	1.4688	91	455
TF Cargo	2	4	40	0.6528	26	52
TTLR	4	4	50	0.6528	33	131
					Total	**4,065**

2.1.7.1 Buried Piping

Buried piping at the facility is discussed in the following subsections.

Exposed Buried Piping Inspection

18 AAC 75.080(g) **The owner or operator shall ensure that, if a piping segment of a buried facility oil piping installation is exposed for any reason, the segment is carefully examined, for damaged coating or corroded piping in accordance with API 570.**

All buried pipe that is exposed for any reason will be examined for damage to the coating and the pipe. If corrosion is found, DW will take remedial action appropriate to the level of corrosion and the soil conditions to control future corrosion. Significant repairs or replacements must meet new installation requirements.

Third Party Inspection on Buried Piping Without Cathodic Protection

18 AAC 75.080(h) **An owner or operator or a buried facility oil piping installation of metallic construction without cathodic protection shall ensure that the piping**

(1) is electrically inspected by a corrosion expert for active corrosion at least once every three years, but with intervals between inspections not exceeding 39 months; and

(2) in areas in which active corrosion is found, cathodically protected in accordance with (d) or (f) of this section, as appropriate.

All buried piping at the facility does not have cathodic protection. Buried piping without cathodic protection is inspected every three years (not exceeding 39 months) by a corrosion expert. If active corrosion is found, action is taken to cathodically protect the piping in accordance with 18 AAC 75.080(d) or (f).

2.1.7.2 Aboveground Piping

Aboveground piping at the facility is discussed in the following subsections.

Piping Supports

18 AAC 75.080(i) **The owner or operator shall ensure that aboveground facility oil piping is supported consistent with the requirements of Paragraph 321 of *Process Piping*, (ASME B31.3-2004), adopted by reference in (c) of this section.**

Piping supports have chafing pads to prevent pipe corrosion, rings, or ears to prevent disengagement from supports and foundations to prevent sag or stress. All supports will be maintained in accordance with the requirements of AMSE B31.3-2004.

Third Party Inspection of Aboveground Piping

18 AAC 75.080(j) **After December 30, 2007, unless the owner or operator must comply with a more stringent requirement set out in this section, the owner or operator shall ensure that all facility oil piping is maintained and inspected under**
(1) API 570
(2) another equivalent program approved by the department.

Piping is maintained and inspected in accordance with API 570 (18 AAC 75.080(j)(1)). The facility contains Class 1 and 3 piping. Class 1 and 3 facilities should receive a formal API 570 Inspection (by a certified inspector) every 5 to 10-years along with UT measurements. The last API 570 inspection was performed in 2022.

All facility marine cargo piping and flexible non-metallic hose is pressure tested annually to 1.5 times its Maximum Allowable Working Pressure (MAWP) in accordance with CG regulations. Test results are maintained for at least three (3) years.

All aboveground pipes and valves are visually inspected for leaks or damage during routine operations or at least monthly.

Atmospheric Piping Corrosion

18 AAC 75.080(l)

The owner or operator of aboveground facility oil piping, other than piping specified in (m) of this section, shall ensure that the piping is protected from atmospheric corrosion by the application of a protective coating or by the use of corrosion-resistant material unless the owner or operator demonstrates by test, investigation, or experience appropriate to the environment of the piping segment that the anticipated extent of corrosion will

(1) only be a light surface oxide or

(2) no affect the safe operation of the piping before the next scheduled inspection under a program developed under (j) of this section.

Aboveground piping at the facility has a protective coating that protects the piping from atmospheric corrosion. The protective coating meets the requirements of 18 AAC 75.080(p)(3).

Soil-to-Air Interface

18 AAC 75.080(m)

The owner or operator of aboveground facility oil piping located outside a sufficiently impermeable deck onboard a marine structure or at a soil-to-air interface shall ensure that the piping is protected against external corrosion through the application of a protective coating or by the use of corrosion-resistant materials.

Soil to air interfaces are protected from corrosion with wrapping or coating or piping made of corrosion resistant material. Where piping daylights at the facility, the pipe is wrapped. Facility personnel maintain the wrapping and keep brush, soil and debris cleared to prevent corrosion or damage to the wrapping.

Piping Valves

18 AAC 75.080(n) **The owner or operator of aboveground facility oil piping and valves must ensure that the piping and valves are**

(1) visually checked for leaks or damage during routine operations or at least monthly, and

(2) appropriately protected from damage by vehicles.

Facility personnel visually inspect for leaks or damage during routine operations or at least monthly; these inspections are documented on the Monthly Facility Inspection Form. Piping is protected from damage by vehicles. Piping is protected from damage by vehicles with bollards, rails or is inaccessible to vehicles.

2.1.7.3 Out of Service Piping

18 AAC 75.080(o) **The owner or operator of facility oil piping that is removed from service for more than one year shall ensure that the facility oil piping is free of accumulated oil, identified as to origin, marked on the exterior with the words "Out of Service" and the date taken out of service, secured in a manner to prevent unauthorized use, and either blank flanged or otherwise isolated from the system. For piping removed from service after December 30, 2006, the owner or operator shall notify the department when facility oil piping is removed from service and when the actions required by this subsection are completed.**

Unless completely removed, any facility piping taken out of service for more than one year is:

- Free of oil;
- Labeled with its origin, date taken out of service, and the lettering “OUT OF SERVICE”; and,
- Isolated from the system and secured to prevent its use.

DW will notify ADEC when piping is removed from service and when the above actions have been taken.

2.2 Discharge History

18 AAC 75.425(e)(2)(B) **DISCHARGE HISTORY - A history of all known oil discharges greater than 55 gallons that have occurred at the facility within the state; the history must include**
(i) the source, cause, amount of each discharge;
(ii) corrective action taken;
(iii) an analysis of the relationship, if any, between the frequency, cause, and size of the discharges; and
(iv) a description of actions to be taken to prevent or mitigate similar discharges in the future.

The table below includes a summary of all known discharges greater than 55 gallons that have occurred at the facility.

Table 2.2-1 Discharge History Greater Than 55 Gallons

Date	Source/Cause/ Amount	Amount (Gallons)	Corrective Actions	Analysis (Cause, Frequency, Size)	Prevention Actions to Take
2/10/2004	Four (4) bolts came loose on a pipe fitting due to freeze-thaw, resulting int the release of AVGAS.	3,400	Tightened bolts	Loose bolts due to temperature change, rare occurrence	Continue conducting inspections.
2/11/2008	Equipment failure at the TTLR, resulting in a discharge of gasoline.	225	Replace O-ring with temperature change resistant O-ring	O-ring failed due to rapid temperature change, rare occurrence	Replace all known O-rings with temperature change resistant O-ring.
4/21/2015	Customer tank truck overfilled at TTLR, resulting in discharge of Jet A.	150	Customer truck evaluated and tested Scully system	New truck, truck Scully system not working, procedures not followed. Trailer parked outside SCA	SCA enlarged so trucks and trailers are on SCA.

Date	Source/Cause/ Amount	Amount (Gallons)	Corrective Actions	Analysis (Cause, Frequency, Size)	Prevention Actions to Take
5/29/2020	Tank 1 failure, SCA failure, resulted in discharge of diesel.	735	Tank 1 removed from service; Tanks 2,3, and 4 received internal liners, both Tank Farm SCAs received new spray in liner	Penetration found in bottom of Tank 1; frequency is very rare. Size was small in relation to the tank volume (~500,000 gallons)	Continue conducting tank inspections, removed fuel from Tank 1 for engineering analysis. Implemented corrective actions described in corrective action column.

2.3 Potential Discharge Analysis

18 AAC 75.425(e)(2)(C) **POTENTIAL DISCHARGE ANALYSIS - An analysis of potential oil discharges, including size, frequency, cause, duration, and location, and a description of actions taken to prevent a potential discharge.**

Below is a listing of potential sources of incidents, their causes and potential frequency.

2.3.1 Aboveground Storage Tank (AST)

Cause of discharge:	Overfills, corrosion, physical damage that ruptures the tank, equipment failure, or earthquake.
Size/rate of flow:	Size depends on rate of flow and duration – a few gallons up to the largest tank volume (517,797 gallons); overfill rate not to exceed 1,000 gpm based on the pipeline delivery rate.
Frequency:	Very low because of regular inspection and maintenance.
Duration:	A leak from small holes caused by corrosion in the bottom might endure for weeks or months depending on the flow rate. Ruptures in the shell will be discovered within minutes and could be stopped in minutes to hours, depending on the size.
Location:	Tank farm SCA.
Prevention:	Inspection and maintenance. Transfer procedures and active monitoring.

2.3.2 Aboveground Pipelines

Cause of discharge:	Corrosion, rupture, and flange failure cause leaks in pipelines. Rupture is most likely caused by physical damage. Flange failure is usually caused by gasket failure.
Size/rate of flow:	1,000 gallons; based on the maximum intervals between a visual detection of a leak in the system, and the subsequent shutting off of valves and/or pumps to stop the discharge.
Frequency:	Very low because of inspection and maintenance.
Duration:	Leaks in aboveground pipes are easily and quickly detected – duration is estimated to be one hour.
Location:	Outside containment area along the pipeline corridor.
Prevention:	Inspection and maintenance; an emergency pipe repair kit is kept onsite. Transfer procedures and monitoring.

2.3.3 Marine Header/Dock Piping

Cause of discharge:	Marine header, piping or hose failure or damage.
Size/rate of flow:	300 gallons (maximum); not to exceed 1,000 gpm based on delivery rate into tankage.
Frequency:	Very low because of inspection and maintenance.
Duration:	Two to five minutes. Because valves are closed when fuel is not being transferred, leaks would only occur during transfers when operating personnel are present and would detect the leak immediately.
Location:	Marine header SCA; Lutak Inlet.
Prevention:	Inspection, maintenance, pressure testing, and transfer procedures.

2.3.4 Transfers (TTLR)

Cause of discharge:	Transfer spills are most commonly the result of operator error. Infrequently they are caused by equipment failure.
Size/rate of flow:	Up to 300 gallons; not to exceed 100 gpm.
Frequency:	Less than twice a year.
Duration:	Less than three minutes because transfers are attended by operators.
Location:	TTLR.
Prevention:	Transfer procedures and personnel training are the primary means of preventing transfer spills.

2.3.5 Valves

Cause of discharge:	Deteriorated seals or flanges.
Size/rate of flow:	Normally less than one gallon. Flow rate is one gallon per hour.
Frequency:	Very low because of inspections and maintenance.
Duration:	Less than one hour.
Location:	Valves are located in the tank farm and pump house.
Prevention:	Inspection and maintenance.

2.3.6 Camlock Connection

Cause of discharge:	Faulty camlock connection not properly seated.
Size/rate of flow:	Estimate 0.25 to 1-gallon. Flow rate 25 gallons per minute.
Frequency:	Less than once a year.
Duration:	Less than a minute because transfers though camlocks are attended by operators.
Location:	TTLR.
Prevention:	Transfer procedures and personnel training.

2.4 Specific Conditions

18 AAC 75.425(e)(2)(D) SPECIFIC CONDITIONS - A description of
(i) any conditions specific to the facility or operation that might increase the risk of a discharge, including physical or navigation hazards, traffic patterns, and other site-specific factors; and
(ii) any measures that have been taken to reduce the risk of a discharge attributable to these conditions, including a summary of operating procedures designed to mitigate the risk of a discharge.

Natural conditions that might increase risk of discharge:

1. Earthquakes and Tsunamis: The Haines Facility is in an area with periodic seismic events including earthquakes and tsunamis. The tank farm was designed and constructed to meet or exceed the UBC Division 1 seismic zone 4 classification. Tsunami waves may be associated with seismic events in the area. The dock and marine header are located within the tsunami inundation zone (Nicolsky 2018). Tsunami warnings would be issued by the National Tsunami Warning Center (http://wcatwc.arh.noaa.gov/). A tsunami warning may not be issued quickly enough before a locally generated tsunami makes landfall. Facility operators should take action as soon as it is safe to do so after a major earthquake to mitigate effects from a potential tsunami. About 15 percent of Alaska's earthquakes occur in Southeast Alaska. The Haines Facility is near multiple fault systems including the Eastern Denali fault, Queen Charlotte-Fairweather fault, Yakutat and Boundary fault systems. The facility has an Emergency Evacuation Plan and routes. Tanks and piping not in use are kept closed and/or locked as appropriate. Tanks and piping at the Haines Facility are inspected after any major earthquake to ensure no damage or leaks have occurred.
2. Landslides: Landslides are also a potential hazard in Haines because of climate, topography, and the likelihood of earthquakes, which are known triggers of landslides. Submarine landslides may produce tsunami generating waves, potentially impacting the facility components within the tsunami inundation zone (Nicolsky 2018). The facility has an Emergency Evacuation Plan and routes. Tanks and piping not in use are kept closed and/or locked as appropriate.
3. Strong winds: In the past, strong winds have not caused any damage to storage facilities. Tanks 1 through 8 are anchored with bolts to the concrete foundations. The tanks in their useful service life have not experienced any problems in overturning from wind or earthquakes.
4. Permafrost and/or frost heaves: Permafrost exists in areas where the winter freezing depth exceeds the depth of summer thawing. During the spring and summer thaw, the ground below the length of the pipeline is closely monitored to ensure no significant frost heaving takes place, and if so, action is taken to prevent excessive stress on the pipeline.

Human caused conditions that might increase risk of discharge:

1. Vessel traffic patterns. Vessels losing control from propulsion or strong winds could cause a hazard at a dock including damage to vessels or the dock. A transfer would be shut down upon detecting an imminent impact. Valves on the dock, at the headers and tanks would be closed to mitigate damage from a spill.
2. Vandalism or sabotage have not been an issue at this facility. See Section 2.1.3 and 2.3.

2.5 Discharge Detection

18 AAC 75.425(e)(2)(E) **DISCHARGE DETECTION - A description of the existing and proposed means of discharge detection, including surveillance schedules, leak detection, observation wells, monitoring systems, and spill-detection instrumentation; if electronic or mechanical instrumentation is employed, detailed specifications, including threshold detection, sensitivities, and limitations of equipment must be provided.**

Discharge detection is conducted through the following means:

- Facility personnel visually monitor the facility during business hours to enable discovery of potential or actual weeps, seeps, leaks, or spills.
- Prior to marine oil transfers, transfer equipment is visually inspected by transfer personnel to enable discovery of potential or actual equipment issues that may cause a discharge of oil.
- During bulk fuel deliveries, a watchman also will be stationed at the tanks. He will be in radio communication with the person in charge of the delivery. If any irregularity occurs, including overflowing a tank, the watchman will notify the person in charge of delivery who will immediately order the discharging vessel to shut down its pumps.
- Each tank is set on a concrete pad and is visually checked at least monthly for visual signs of a tank bottom leak and is documented on the Facility Monthly Inspection Form (in Appendix A).
- Each tank is equipped with overfill protection and a liquid level gauge that an operator can visually check the liquid level.

Any identified deficiencies are reported to the Facility Manager for corrective action which may include isolating the component, transferring oil to another container, or installing catchment basins until maintenance can be accomplished. Personnel immediately cleanup any spilled oil using containment, sorbents, and skimmers as needed for the specific situation.

2.6 Waivers

18 AAC 75.425(e)(2)(F) **WAIVERS - For an operation subject to a waiver, alternate compliance schedule, or existing condition of plan approval under 18 AAC 75.005 - 18 AAC 75.085 or 18 AAC 75.400 - 18 AAC 75.496, documentation of**

(i) each waiver, alternate compliance schedule, or existing condition of plan approval; and

(ii) the approval of each waiver, alternate compliance schedule, or existing condition of plan approval.

This facility has no operations subject to a waiver, alternate compliance schedule, or existing conditions of CPLAN approval.

3 SUPPLEMENTAL INFORMATION

18 AAC 75.425(e)(3) **SUPPLEMENTAL INFORMATION: The supplemental information section must provide background and verification information, including**

Supplemental information, required by 18 AAC 75.425(e)(3), is provided in the following subsections.

3.1 Facility Description and Operational Overview

18 AAC 75.425(e)(3)(A) **FACILITY DESCRIPTION AND OPERATIONAL OVERVIEW - A general description of the oil storage, transfer, exploration, or production activities of the operation, including**

(i) the number, type, and oil storage capacity of each container covered under the plan and its installation date, design, construction, and general condition;

(ii) the type and amount of oil stored in each container;

(vi) a general description of the procedures for the loading or transfer of oil from or to a storage tank.

Refer to Section 2.1.5 for the number, type, and capacity of all containers and the type and amount of oil stored in each container covered under this CPLAN. Safe fill heights are marked on each tank at the facility.

Refer to Section 2.1.4 for a general description of the procedures for the loading or transfer of oil from or to a storage tank.

3.2 Receiving Environment

18 AAC 75.425(e)(3)(B) **RECEIVING ENVIRONMENT - For a land-based facility or operation:**

(i) the potential routes of travel of oil discharged from the facility or operation to open water in the form of a drainage diagram or map, showing gradients and potential containment sites and features, including identification and explanation of all measures that will be taken to prevent a discharge from entering open water; and

(ii) based on the information in (i) of this subparagraph, an estimate of what percentage of the applicable response planning standard volume set out at 18 AAC 75.430 - 18 AAC 75.436, or 18 AAC 75.442 for the facility or operation will reach open water;

The potential routes of travel of oil discharged at the facility are depicted on the drainage diagram, which is presented in Section 1.8.

The Response Planning Standard (RPS) for the facility is based on the largest tank inside of a SCA. Tanks 2 through 6 have the same capacity. For planning purposes, Tank 6 was used for the RPS discharge spill scenario. Refer to Section 5 of this CPLAN for the adjusted RPS and an estimated percentage to reach open water.

Spills to land may include the soils surrounding the TTLR and the soils adjacent to the tank farm. A diagram which shows the direction of flow of spills to land is presented in Section 1.8. A public water system for the Haines Ferry Terminal, ID AK2110855, is located within 0.25 miles southwest of the tank farm. This public water system is located up gradient from the facility and would not be threatened by a discharge, as spilled product would migrate down gradient from the facility.

An estimate of the RPS to reach open water is 10,000 gallons. This value was derived from the distance to open water (>800 feet), the lack of a conduit for the fuel, and the absorptive soils in the area. The pipelines are described in Section 2.1.7. The tank farm facility is elevated 200 feet above Lutak Road level.

It can be reasonably assumed that the RPS leaving the SCA of the tank farm would travel northeast from the tank farm and may potentially reach the Lutak Inlet. There are many obstacles preventing the entire RPS volume from entering Lutak Inlet. The fuel would need to travel down toward the lower tank farm to the Inlet. Since there is not a clear path, it can be reasonably assumed that a large volume of the RPS would be dispersed and absorbed as the fuel makes its way down to the Inlet. The soils in this area are absorptive

(USDA 2001). Even with the absorptive properties of the soil in the immediate area, it is expected that some of the release would pool on land in the ditch along Lutak Road.

Once fuel has reached the bottom of the hill there is no readily available conduit to allow the fuel to flow into the Inlet. The facility piping is encased in concrete road crossing and thus unable to provide a conduit across the road. If a large enough volume of fuel were spilled that would allow the fuel to cross over the road, it would then need to cross the dock area (which contains D-1, a relatively impermeable substrate), and travel approximately 300 feet to reach the water. It is estimated that no more than 10,000 gallons could reach open water.

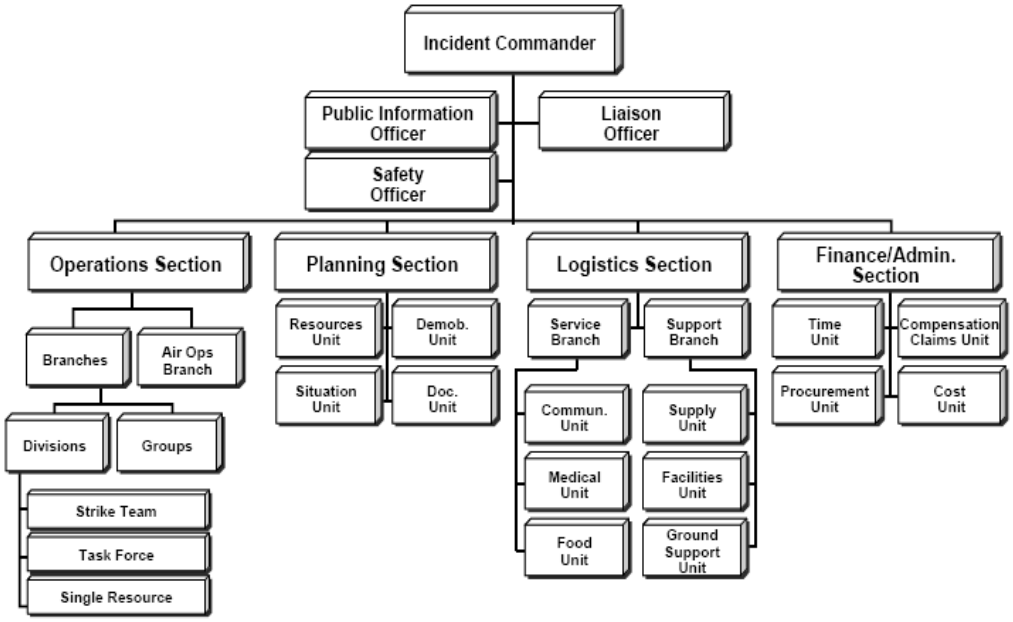
3.3 Command System

18 AAC 75.425(e)(3)(C) **COMMAND SYSTEM - A description of the command system to be used in response to a discharge, including the title, address, telephone number, and affiliation by company, agency, or local government of each person, including a person identified in (1)(B) of this subsection, who by law or through employment, contract, or cooperative agreement, is responsible for responding to a discharge, and each person's functional role in the command system; this list must include command, fiscal, operations, planning, and logistics lead personnel; the command system must be compatible with the state's response structure outlined in the state master plan prepared under AS 46.04.200.**

The ICS is a standardized on-scene incident management concept designed specifically to allow responders to adopt an integrated organizational structure equal to the complexity and demands of an incident without being hindered by jurisdictional boundaries. The Unified Command Structure facilitates the integration of the concerns of local, state, and federal authorities. Consistency of information, a clear chain of command and authority and the ability to evaluate the effectiveness and safety of the response actions give the IC the ability to manage the response with a wide range of people and interests participating.

The goal of incident response operations is the restoration of normal operations while minimizing impacts to people, property, and the environment. To achieve this goal, incident response organization personnel at all levels must be able to move from a reactive to a proactive mode of operations by observing and communicating the problem, its potential, and what is being done to address the problem. Below is an ICS organizational chart example.

Figure 3.3-1 Command Structure



3.3.1 Qualified Individuals

DW adopts the federal response plan designation of QIs. Names and contact numbers of DW's QIs are located in Section 1.2 of this CPLAN.

Each QI is designated in writing by DW and:

- Is available on a 24-hour basis
- Speaks fluent English
- Is located in the United States
- Is familiar with the implementation of the facility's response plans, including this CPLAN
- Is trained in the responsibilities of the QI under the facility's response plans, including this CPLAN

Each QI is authorized by DW to have full authority to:

- Activate the DW facility's response plans, including this CPLAN
- Activate and engage in contracting with PRACs/Oil Spill Removal Organization (OSROs) and other response related resources identified in this CPLAN, and
- Act as a liaison between the facility owner/operator and the pre-designated State and Federal On-Scene Coordinators
- Obligate funds required to carry out response activities

The QI is not responsible for the adequacy of response plans prepared by the owner or operator or for contracting or obligating funds for response resources beyond the full authority contained in their designation from the owner or operator of the facility.

3.3.2 Spill Management Team

DW recognizes the need to organize initial oil spill response management in a manner that will allow for efficient "ramping up" of response activity if the size or complexity of an oil spill increases. The fundamental spill management concepts promote an integrated management approach to the implementation of this CPLAN with facility personnel, Federal and State regulators, and response contractors.

DW uses a two-phase approach – Emergency Phase is primarily filled initially by DW IMT personnel and Response Phase which is filled primarily by contracted IMT personnel.

Table 3.3.2-1 DW Emergency Response Phases

Emergency Phase:	Response Phase:
Internal Personnel	
Qualified Individual (QI)	Qualified Individual (QI), as needed
Initial On Scene Commander (IOSC)	IOSC until transfer to IC is complete
	Incident Commander (IC)
On-Site Safety Officer (SO)	IMT Safety Officer (SO)
Logistics Section Chief (LSC)	Logistics Section Chief (LSC)
Information Officer (PIO)	Information Officer (PIO)
Finance Section Chief	Finance Section Chief
Planning Section Chief	Planning Section Chief
	Operations Section Chief
	Liaison Officer (LIO)
	Communications
External Personnel	
State On Scene Coordinator (SOSC)	
Federal On Scene Coordinator (FOSC)	
Primary Response Action Contractor (PRAC) / Oil Spill Response Organization (OSRO)	
Incident Management Team (IMT)	

PRACs identified in Section 3.8 of this CPLAN will integrate into the ICS structure at the request of DW. The specific ICS roles filled by PRACs will depend on the size and complexity of the incident. The PRAC will not take over the management of a response but may support DW IMT as requested.

Witt/O'Brien's Response Management provides DW with IMT services. Upon activation by DW, Witt/O'Brien's will fill one or all Incident Command positions including those listed in the table above.

Other third-party contractors under contract to DW during the response may fill specific positions, as needed.

The on-scene command center will initially be the facility office. Alternate command centers may be found in the applicable ACP, Section 5220.1 – Incident Command Post Options.

3.3.3 ICS Position Tasks

ICS positions for the Emergency Phase of a response are included in this section. The roles, responsibilities, and specific requirements of the spill management team members will vary depending on the incident and may even vary during the same incident. Staffing considerations, including the number of personnel and the organization structure, are dependent on the size and complexity of the incident. There is no absolute standard to follow. However, large-scale incidents will usually require that each component, or section, is set up separately with different staff members managing each section. A basic operating guideline is that the IC is responsible for all activities until command authority is transferred to another person.

The Alaska Incident Management System and/or CG Incident Management Handbooks (IMH) are guidance documents used by response personnel but are not policy. In each chapter of the CG IMH are incident specific IMT job descriptions.

3.3.3.1 Unified Command (UC)

The UC directs all aspects of the incident response and uses a designated IC to manage containment control and cleanup operations. A DW representative or contracted personnel will fill the role of the IC.

The UC consists of the IC and federal, state and local On Scene Coordinators. Depending on the situation, other agencies with authority and jurisdiction may be added to the UC.

3.3.3.2 Initial On-Scene Commander (IOSC)

The IOSC is responsible for the safety of personnel and the facility, directs the response team in immediate safety and spill response actions. The IOSC:

1. Evaluates potential safety risks to personnel and the public
2. Reviews Emergency Action checklist in Section 1.1 of this CPLAN
3. Stops the source of the spill, if possible
4. Shuts down and isolate operations
5. Initiates the containment and recovery response based on safety of personnel
6. Follows the Notification Procedures in Section 1.2 of this CPLAN
7. Evaluates and requests additional assistance as necessary
8. Transfers IOSC responsibilities to the designated IMT upon their arrival

3.3.3.3 Incident Commander

The IC is responsible for all aspects of the response, including developing incident objectives and managing all incident operations. The IC is faced with many responsibilities upon arrival at the scene. Unless specifically assigned to another member of the Command or General Staff, these responsibilities remain with the IC.

3.3.3.4 Command Staff

The Command Staff is responsible for public affairs, health and safety, and liaison activities within the ICS. The IC remains responsible for these activities or may assign individuals to carry out these responsibilities and report directly to the IC. Command Staff positions include:

Table 3.3.3.4-1 Command Staff

Position	Duties
Information Officer (PIO)	Develops and releases information about the incident to the news media, incident personnel, and other appropriate agencies and organizations.
Liaison Officer (LIO)	Serves as the point of contact for assisting and coordinating activities between the IC and various agencies and groups. This may include Congressional personnel, local government officials, and criminal investigating organizations and investigators arriving on the scene. The LIO is assigned to the incident to be the contact for assisting and/or cooperating Agency Representatives.
Safety Officer (SO)	Develops and recommends measures to the IC for assuring personnel health and safety and to assess and/or anticipate hazardous and unsafe situations. The SO corrects unsafe acts or conditions through the regular line of authority but may exercise emergency authority to stop or prevent unsafe acts when immediate action is required. The SO also maintains awareness of active and developing situations, develops and implements the SSHP, reviews the Incident Action Plan (IAP) for safety implications, and provides timely, complete, specific, and accurate assessment of hazards and required controls. Safety assistants/field safety representatives may have specific responsibilities, such as air operations, hazardous materials, etc.
Site Safety Officer (SSO)/Field Safety Representative	Reports to the SO or Field Commander as assigned and is responsible for the health and safety of all response personnel in the field. The SSO is responsible for establishing safety zones, PPE requirements, and for the general overall safety, hazard identification, and preparation of on-scene site safety briefing as designed to protect the field responders. The SSO also supports proper establishment of site access and decontamination facilities.

3.3.3.5 General Staff

The General Staff includes Operations, Planning, Logistics, and Finance/Administrative responsibilities. These responsibilities remain with the IC until they are assigned to another individual. When the Operations, Planning, Logistics or Finance/Administrative responsibilities are established as separate functions under the IC, they are managed by a section chief and can be supported by other functional units. General Staff positions include:

Table 3.3.3.5-1 General Staff

Position	Duties
Operations Section Chief	Is responsible for the management of all field operations directly applicable to the primary mission of the response. The Operations Section Chief activates and supervises organization elements in accordance with the IAP and directs its execution; activates and executes the SSHP; directs the preparation of Unit operational plans, requests or releases resources, makes expedient changes to the IAP, as necessary; and reports such to the IC or UC.
Planning Section Chief	Is responsible for collecting, evaluating, and disseminating information related to the incident; the status of equipment and personnel resources assigned to response operations; preparation and documenting IAPs or each operational period; environmental services including permitting and technical specialists; documentation and records of all response information; and demobilization.
Logistics Section Chief	Is responsible for providing facilities, transportation, communications, services, and material in support of the incident. The Logistics Section Chief participates in development and implementation of the IAP and activates and supervises Branches and Units within the Logistics Section.
Finance/Administration Section Chief	Is responsible for all financial and cost analysis aspects of the incident and for supervising members of the Finance/Administration Section.

3.4 Realistic Maximum Response Operation Limitations

18 AAC 75.425(e)(3)(D) REALISTIC MAXIMUM RESPONSE OPERATING LIMITATIONS - A description of the realistic maximum response operating limitations that might be encountered at the facility or operation and, based on environmental and safety considerations, an analysis of the frequency and duration, expressed as a percentage of time, of limitations that would render mechanical response methods ineffective; the realistic maximum response operating limitations for a response must be defined, with a description of any additional specific temporary prevention or response measures that will be taken to reduce the environmental consequences of a discharge, including nonmechanical response options, during those periods when environmental conditions exceed this maximum; environmental conditions to be considered in this analysis must include

- **(i) weather, including wind, visibility, precipitation and temperature;**
- **(ii) sea states, tides, and currents;**
- **(iii) ice and debris presence;**
- **(iv) hours of daylight; and**
- **(v) other known environmental conditions that might influence the efficiency of the response equipment or the overall effectiveness of a response effort.**

Realistic maximum response operating limitations are provided in the following subsections.

3.4.1 General Adverse Weather Conditions

Haines may experience extreme weather generated from the Gulf of Alaska including high winds, high sea states, cold and heavy snowfall in the winter months which may preclude active containment, control, and recovery actions. Haines has a maritime climate with cool summers and mild winters. The average maximum temperature in the winter is 30°F and 70°F in the summer. The prevailing wind direction in the winter, December through February, is from the north, and from the south from March through November. In the winter, winds from the north can be as high as 70 knots or more (ADEC 2019) and (NOAA 2022c).

It is understood that extreme adverse weather conditions could preclude response action. In the event that response actions cannot take place due to extreme weather, facility personnel may prepare shore anchoring system for containment boom, conduct air surveillance (if possible), and stage equipment so it is ready to be deployed when the weather conditions permit. Refer to Section 1.5 for adverse weather contingencies.

In most cases, these same weather conditions will result in evaporation and dissipation of any spilled product at rates, which would exceed mechanical recovery efforts.

Table 3.4.1-1 Environmental Conditions & Days Per Year Precluding Response[1]

Environmental Conditions	Estimated Number of Days per Year Precluding a Mechanical Response[2]	Prevention Actions
Sea State including tsunami	5	Cease fuel transfers at dock when conditions are unsafe and secure valves
Wind	50	Cease fueling activities during extreme winds
Visibility	5	Additional employees during transfers
Precipitation (snow/ice or heavy rain)	14	Adapt as necessary to prevent spills
Temperature	5	Not applicable

Sources: (NOAA 2022a), (NOAA 2022b), (NOAA 2022c), and (Delta Western Personal Communication, September 2022)

[1]Conditions that preclude a response include wind speeds exceeding twenty knots, visibilities less than 1,500 feet, very heavy precipitation, and extremely cold temperatures for extended periods.

[2]DW does not intend to use non-mechanical response techniques, see Section 1.7.

3.4.2 Sea States, Tides, and Currents

Sea States in Lutak Inlet are usually below Beaufort State 3 (large wavelets, some crests begin to break, foam of glassy appearance, occasional white foam crests). However, strong southeast winds blowing against a strong ebb tide may result in exaggerated standing waves and breaking waves.

On water response activities may not be possible due to equipment limitations and safety considerations in Sea States in excess of Sea State 3. The occurrence of these sea states on a seasonal of monthly basis changes from year to year and prevents an accurate estimate of the number of days per year when these conditions will exist and preclude on water response actions. In general, sea states will be greater during the winter months.

Tides in the Lutak Inlet have a mean tidal range of about 20 feet. The tidal range can vary from approximately plus 21 feet at high tide to minus 5 feet on a low tide. Additionally, strong winds can create storm tides that exceed the normal high tide range. A current copy of the tides for the Haines area is kept at the facility office. High tides are not expected to prevent response actions, but strong tidal currents may diminish the effectiveness of some on water operations, i.e. containment booming and weir skimmers. See Section 1.6 for information on operating containment and recovery equipment.

The primary currents in Lutak Inlet are the diurnal ebb and flood tide currents. The tide floods to the northwest, and ebb to the southeast. Maximum flood tide currents average 0.3 knots, and ebb tide currents average 0.5 knots. (NOAA 2022a, NOAA 2022b, and NOAA 2022c).

3.4.3 Wind

The prevailing wind at the facility is from the west or southeast, being channeled by the Lynn Canal, causing a funneling effect. In the winter winds can be as high as 70 knots along the canal. Extreme high winds are created by the narrowing of the canal, specifically when winds are from the south or southeast direction (NOAA 2022c).

Extreme winds would increase and exaggerate the natural rates of evaporation and dissipation of the non-persistent oil stored at the DW facility.

Winds in excess of 20 knots could prevent safe on water response actions, depending on the tide, wind direction, and sea state conditions, which are estimated 50 days per year.

Wind influences the direction that a slick will travel; it can trap oil against the shoreline where it can be stranded; and it affects the rate at which the volatile components of beached oil will evaporate. In addition, wind can cause boom failure by trapping oil against the boom and splashing it over the top or by driving currents that entrain the oil under the booms. Boom mooring points may fail as a result of pressure placed on the anchor points by the wind. Onshore operations are made more difficult because of wind-blown sediments and the displacement of light work equipment. Both onshore and near shore operations are also impacted by wind in that working conditions may become unsafe (for small boats or vessel deck workers), or the air temperature may be lowered and a “wind chill” factor created, reducing the body temperature of the workers and hastening fatigue.

3.4.4 Ice and Debris

Lutak Inlet is typically an ice-free port and sea ice is extremely rare. Ice can form at the shoreline during extreme winter conditions. Debris is present in the channel, especially during high tide cycles and storms. (NOAA 2022c).

3.4.5 Hours of Daylight

Approximate daylight hours per day are:

- Winter 6
- Spring 12
- Summer 18
- Fall 12 (Weatherspark 2022)

The tank farm has lighting for operations in darkness. If conditions allow, recovery operations would be conducted. Because of the dangerous nature of on water operations during darkness, an on water response is unlikely except in good weather conditions at near shore sites, i.e. collection, exclusion and diversion booming.

Portable lighting for on land and shoreline operations is available in Haines through DW, PRAC member companies, and vendors. In the event of a spill during darkness, personnel will prepare for first light operations on water or for immediate deployment of lights on land to facilitate response actions.

3.5 Logistical Support

18 AAC 75.425(e)(3)(E) **LOGISTICAL SUPPORT - Identification of aircraft, vessels, and other means that may be used to transport equipment and personnel during a discharge response, including information on ownership and availability of identified means of transportation.**

Logistical support may include transportation equipment, earth moving equipment, oil storage equipment and other miscellaneous support services. The Logistics Section Chief is responsible for logistical coordination. Available resources include:

- DW owned response equipment listed in Section 3.6
- Resources for SEAPRO can be found at https://www.seapro.org/equipment.html

If needed, aircraft will be used to transport equipment and personnel during a response. If needed, any required air transit restriction zone requirements for aircraft involved in spill response will be coordinated with the local Federal Aviation Administration (FAA).

FAA Air Operations Watch: Haines: 907-766-2499; Juneau: 907-586-7382

If needed, any required vessel transit restriction zone requirements for vessels involved in spill response or Notices to Mariners with the FOSC and/or the CG Captain of the Port (COTP).

Additional vehicles are available from SEAPRO member facilities in Haines.

DW performs preventative maintenance and repairs on its equipment and has a fully equipped maintenance shop at its facility. Additional maintenance parts and personnel can be procured, as needed, to keep the transportation fleet operational for the duration of the spill.

Table 3.5-1 Logistical Resources

Lodging	**City**	**Phone**
Aspen Suites Hotel	Haines	907-766-2211
Captain's Choice Motel	Haines	800-478-2345
Hotel Halsingland	Haines	907-766-2000
Ground Transportation	**City**	**Phone**
Alaska Marine Lines (Lynden Transport)	Haines	907-766-2221
Construction Contractors	**City**	**Phone**
WhiteRock Construction	Haines	907-766-3887
Southeast Road Builders	Haines	907-766-2833
Turner Construction	Haines	907-766-2687
Equipment Rental	**City**	**Phone**
Haines Cable TV (U-Haul)	Haines	907-766-2243
Haines Tool Rental	Haines	907-766-2659
Alaska Industrial Hardware	Juneau	907-790-3300
Tyler Rental https://tylerrental.com/juneau.htm	Haines	907-780-2210
Global Diving & Salvage http://gdiving.com/location/alaska	Anchorage	907-563-9060
Air Services	**City**	**Phone**
Alaska Seaplanes https://www.flyalaskaseaplanes.com/	Haines	907-766-3800
Ward Air https://www.wardair.com/	Juneau	907-789-9150
Temsco http://www.temscoair.com/	Juneau	907-789-9501
Alaska Air Cargo http://www.alaskaaircargo.com/	Juneau	800-225-2752
Alaska Airlines www.alaskaair.com	Anchorage	1-800-252-7522
Marine Transportation Services	**City**	**Phone**
Lynden Transport	Haines	907-766-2221
Alaska Marine Highway	Statewide	1-800-382-9229
Amak Towing http://amaktowing.com/	Ketchikan	907-225-8847 907-617-8890 (24-hr)
Crowley Marine Services (terminals, tugs, barges) www.crowley.com	Statewide	907-777-5505 1-800-248-8632
Foss Marine Company http://www.foss.com/	Seattle, WA	503-978-6561 201-281-3800 (24-hr)
Revilla Tug Co.	Ketchikan Juneau	907-225-2730 907-586-5655
Samson Tug & Barge Co. www.samsontug.com	Statewide	206-767-7820

3.6 Response Equipment

18 AAC 75.425(e)(3)(F) **RESPONSE EQUIPMENT - A complete list of contracted or other oil discharge containment, control, cleanup, storage, transfer, lightering, and related response equipment to meet the applicable response planning standard, and to protect environmentally sensitive areas and areas of public concern that are identified in (J) of this paragraph and that may be reasonable expected to suffer an impact from a spill of the response planning standard volume as described in the response strategies developed under (1)(F) and (1)(I) of this subsection.**

As described throughout this CPLAN, DW's initial spill response activities would rely on local facility based resources that would then be supplemented by other DW or contracted equipment. A summary of the available response equipment, timeframe for delivery and startup, and manufacturers rated capacities are presented in the following subsections.

3.6.1 Location, Inventory, Ownership and Vessels

18 AAC 75.425(e)(3)(F)(i)	**The location, inventory, and ownership of the equipment;**
18 AAC 75.425(e)(3)(F)(iv)	**each vessel designated for oil recovery operations, including skimming vessels and platforms and vessels designated to tow and deploy boom;**
18 AAC 75.425(e)(3)(F)(v)	**information on additional vessels available from other sources for oil recovery operations, including, if applicable, procedures for inventorying, training personnel, and equipping vessels;**
18 AAC 75.425(e)(3)(F)(vi)	**pumping, transfer and temporary storage, and lightering equipment for transferring oil from damaged or undamaged tanks; and**
18 AAC 75.425(e)(3)(F)(vii)	**the procedures for storage, maintenance, and inspection of spill response equipment under the immediate control of the operator when not in use, including procedures for periodic testing and maintenance of response equipment.**

DW owned response equipment that is available at the Haines Bulk Facility is provided in the table below. Response equipment is stored in “ready” status in secured and marked locations. This equipment inventoried and inspected semiannually for wear and deterioration. Operational equipment is also tested semiannually. Routine maintenance on this equipment is performed per the manufacturer’s guidelines by facility personnel.

Table 3.6.1-1 DW Owned Response Equipment at the Haines Facility

Class	Type	Amount/ Capacity	Location
Boom	Containment Boom	1,000 feet	Boom truck at dock
Boom	Tow Bridles	2 each	Warehouse
Boom	Anchor Buoy System	6 each	Warehouse
Boom	Lights	6 sets	Office
Boom	Kepner Boom Repair Kit	1 each	TTLR area
Sorbent	Pads (oil & general purpose)	1,000 feet	TTLR area
Sorbent	Boom 18” x 18”	200 feet	TTLR area
Sorbent	Sweep Boom	200 feet	TTLR area
Sorbent	Sweeps	2 each	TTLE area
Sorbent	Roll	6 each	TTLR area
Sorbent	Kit	1 each	TTLR area
PPE	Rubber boots	6 pair	TTLR area
PPE	Rubber gloves	12 pair	TTLR area
PPE	Rain gear	6 pair	TTLR area
PPE	Safety goggles	6 each	TTLR area
PPE	PFD vests	6 each	TTLR area
PPE	Hard hats	6 each	TTLR area
PPE	Tyvek suits	6 each	TTLR area
Hoses	Suction, 2” x 20’	4 each	TTLR area
Hoses	Discharge, 2’ x 50’	8 each	TTLR area
Hoses	Floats, 2”	4 each	TTLR area
Skimmer	Skim-Pak 4200 SH 651 bbl/day @ 20%	1 each	TTLR area
Skimmer Pump	Yanmar Diesel, L2S5/2” 185 GPM	1 each	TTLR area
Pipe Clamps	6 inch	3 each	TTLR area
Pipe Clamps	4 inch	2 each	TTLR area
Drums	Overpack, 95-gallon	10 each	Warehouse
Drums	Salvage, 55-gallon open top	20 each	Warehouse
Hand Tools	Shovel	3 each	Warehouse
Hand Tools	Rake	3 each	Warehouse
Trash bags	Disposable	1 box	Warehouse
Sheeting	Plastic liner	2 each	Warehouse
Boat	Response Skiff,16’ Northwest w 90 hp	1 each	TTLR area

Table updated: December 2022, subject to change.
[1]Hoses can be used interchangeably for suction or discharge.

In addition, DW owns other equipment including a pickup, a flatbed, tank trucks, and a forklift. The facility has a small maintenance shop; and the communications equipment described in Section 1.4.

For a complete list of SEAPRO response resources go to https://www.seapro.org/equipment.html. A subset of SEAPRO is provided below.

Table 3.6.1-2 SEAPRO Owned Equipment

Type	Amount/ Capacity	Location
Containment Boom (o/b ORBs)	900 feet	Haines
Containment Boom	200 feet	Haines
Sorbent Boom	960 feet	Juneau
Decon Equipment	1	Haines
Crucial Rope Mop	1	Skagway
Crucial Disc C13/24	1	Skagway
Aquaguard RBS	1	Sitka
Action Petroleum	1	Haines
Canflex Sea Slug FCB-43E (100 bbl)	1	Haines
Canflex Sea Slug FCB-60 (157 bbl)	1	Juneau
Vikoma Bladder (79 bbl)	1	Juneau
Canflex Open Top Portable Tank (23 bbl)	1	Haines
Desmi DOP 160	1	Haines
Waterproof Drone	1	Ketchikan
Field Hazing Kit	1	Haines
ORB 7 (249 bbl)	1	Haines
ORB 8 (249 bbl)	1	Haines
MOU Tug	1	Skagway
Work Skiff	4	Haines/Juneau/Gustavus

Table updated: April 2023

3.6.2 Time Frame for Delivery and Startup

18 AAC 75.425(e)(3)(F)(ii) The time frame for delivery and startup of response equipment and trained personnel located outside the facility's primary region of operation.

The time frame for delivery and startup of response equipment located outside the facility's region of operations is provided in Section 1.5 of this CPLAN.

3.6.3 Manufacturers Rated Capacities

18 AAC 75.425(e)(3)(F)(iii) The manufacturer's rated capacities, limitations, and operational characteristics for each item of oil recovery equipment, including any nonmechanical response techniques.

The table below contains the manufacturers rated capacities for both DW and SEAPRO equipment.

Table 3.6.3-1 Manufacturers Rated Capacities for DW & SEAPRO Equipment

Type – Manufacturer	Manufacturer bbl/hr	EDRC* (bbls/day)
Skim-Pak 4200 SH skimmer	27.14	651
Action Petroleum Multi skimmer	100	480
Crucial Rope Mop	25	120
Crucial Disc C13/24 skimmer	121	581
Aquaguard RBS	150	720

*Effective Daily Recovery Capacity (EDRC) = 20% of the manufacturer's rated throughput capacity over a 24-hour period.

3.6.4 Oil Spill Recovery Vessels

18 AAC 75.425(e)(3)(F)(iv)	**Each vessel designated for oil recovery operations, including skimming vessels and platforms and vessels designated to tow and deploy boom.**
18 AAC 75.425(e)(3)(F)(v)	**Information on additional vessels available form other sources for oil recovery operations, including, if applicable, procedures for inventorying training personnel, and equipping vessels.**

Vessels used for oil spill recovery are listed in the SEAPRO Technical Manual and discussed in Section 3.6.1 of CPLAN.

3.7 Nonmechanical Response Information

18 AAC 75.425(e)(3)(G) NONMECHANICAL RESPONSE INFORMATION

DW does not plan to employ non-mechanical response. See Section 1.7.

3.8 Oil Spill Primary Response Action Contractor

18 AAC 75.425(e)(3)(H) OIL SPILL PRIMARY RESPONSE ACTION CONTRACTOR INFORMATION

DW relies on the following PRAC to provide resources to meet the applicable RPS. A copy of the statement of contractual terms is provided on the following pages.

PRAC:

SEAPRO
540 Water Street, Suite 201
Ketchikan, AK 99901
Ph. 907-225-7002
Fax 907-247-1117
David Owings, General Manager
www.seapro.org

SEAPRO is registered as a PRAC with ADEC and maintains either through ownership or contract, response equipment in Haines, Juneau, and most major ports in SE Alaska. See the SEAPRO website for a list of their response equipment.

In addition, DW will use the following IMT service provider, as needed.

WITT/O'Brien's Response Management, Inc.

24 hr Emergency	985-781-0804	Anchorage, AK 907-677-1885
Slidell, LA	985-781-0804	Fax: 985-781-0580

www.wittobriens.com

Certificate of Membership

This is to certify that

Delta Western, LLC.

is a member in good standing of the

SOUTHEAST ALASKA PETROLEUM
RESPONSE ORGANIZATION

An Alaska Not For Profit Corporation
SEAPRO's mission is to mitigate oil spills, at the direction of its membership, in the Southeast Alaska Captain of the Port Zone.

Delta Western, LLC.
is entitled to refer to the resources at SEAPRO's disposal in their Oil Pollution Prevention and Response Contingency Plans, and to represent to governmental agencies and to others that these capabilities and resources are available to the Member when needed to contain, control, or clean up any oil spill.

This membership is effective from
January 1 to December 31, 2023

Dave Owings
General Manager

3.9 Training

18 AAC 75.425(e)(3)(I) TRAINING - a detailed description of the training programs for discharge response personnel;

DW's training program for oil handling personnel includes the following components:

- Prevention training (refer to Section 2.1 of this CPLAN)
- Response training
- Oil spill response drills and exercise

3.9.1 Response Training

DW spill response personnel receive safety training applicable to their job duties. DW spill response personnel may include any of the positions identified in Section 2.1.1. DW spill response personnel also attend an annual review of the facility's CPLAN.

DW also provides periodic training for its QIs and Spill Management Team personnel.

3.9.2 Oil Spill Response Drills and Exercises

DW conducts the following drills and exercises to the National Preparedness for Response Exercise Program for spill response:

- Quarterly QI Notification
- Semiannual Equipment Deployment
- Annual Spill Management Team tabletop
- Annual Unannounced Drill (can be combined with tabletop or equipment deployment)

These drills and exercises cover boom deployment, skimmer operation, lightering or transfers of oil, and organization and mobilization of response equipment and personnel.

Records of training and drills are maintained through normal business practices for five years.

3.10 Protection of Environmentally Sensitive Areas

18 AAC 75.425(e)(3)(J) **Protection of environmentally sensitive areas and areas of public concern - for a stationary facility or operation, identification of environmentally sensitive areas and areas of public concern that may suffer an impact from a spill of the applicable response planning standard volume; if identification of those areas and site-specific strategies for protection of those areas are in an applicable subarea contingency plan, the plan holder may incorporate that information by reference; whether prepared separately or incorporated by reference, the identification of and planned protection measures for those areas must be based on mapped predictions of discharge movement, spreading, and probable points of contact, based on expected local, seasonal, meteorologic, and oceanographic or topographic conditions; and, for each probable point of contact, must include a description of each environmentally sensitive area and each area of public concern, including**

- **(i) the effect of seasonal conditions on the sensitivity of each area;**
- **(ii) a discussion of the toxicity effects and persistence of the discharge, based on type of product;**
- **(iii) an identification of which areas will be given priority attention if a discharge occurs;**

The ADEC, EPA Region 10, and the CG District 17 and Sector Anchorage, Sector Juneau, and Marine Safety Unit Valdez manage response operations in accordance with the Alaska Regional Contingency Plan (RCP) and four ACPs. The DW Haines Bulk Facility operations are covered under the Southeast Alaska ACP (ADEC 2021).

The identification of and protection of ESAs are discussed in the following subsections.

3.10.1 Seasonal Conditions

The seasonal effect on environmental sensitivity is limited to whether or not some forms of wildlife or aquatic plant life are in critical periods of life. Critical periods are generally defined as time periods where species are involved in migration, breeding, nesting, and/or

rearing young. It may also refer to time periods during the life cycle of a species, such as the juvenile stages of fish, or larvae stage of aquatic insects.

In general, marine organisms most likely to be impacted by a discharge into a sensitive area are most at risk during spring, summer and fall months. Saltwater ducks and some seabirds, such as old squaw ducks, cormorants, and gulls remain present throughout the Lutak Inlet area all year round. In winter months, raptors such as eagles and ospreys concentrate near food sources, such as the mouths of rivers and harbor areas. Harbor seals are present year-rounds in the Upper Lynn Canal area, but haul outs are infrequent during the winter months (ADEC 2019 and ADF&G 1999).

Spring and fall months are high risk times for almost all coastal areas, especially river mouths, salt marshes, protected bays, and lagoons. Out-migrating salmon smolt are present in the nearshore areas in most of the shoreline areas during the period from May to July. Spawning herring, smelt, capelin, and candlefish are typically found in the shallow beach areas throughout the area during the spring months. In some areas, Dungeness crab also frequent the intertidal zone during this time, making them vulnerable to oil discharged into that environment (ADEC 2019).

Migratory waterfowl are present from May to September. Shore birds are present in the area with highest concentrations in the summer months. These birds frequent the intertidal zones and will be at risk from a discharge into those areas. Many waterfowl are year-rounds residents (ADEC 2019 and Audubon 2010).

Invertebrates and other small organisms found in the intertidal zone are more likely to be found in the sub tidal zones during the winter months due to low temperatures (ADEC 2019).

Based on the above, a spill in the winter months would pose a reduced overall risk to ESAs which could be impacted by a spill from the facility.

The following table identifies critical periods for wildlife observed in the Haines Facility area. This information can be used to determine additional ESAs during a spill response.

Table 3.10.1-1 Critical Life Periods of Wildlife & Aquatic Plant Life

	Month											
Species	**J**	**F**	**M**	**A**	**M**	**J**	**J**	**A**	**S**	**O**	**N**	**D**
Birds[1]												
Glaucous-winged gull				X	X	X	X	X	X			
Black oystercatcher				X	X	X	X	X	X			
Marbled murrelet	X	X	X	XN	XN	XN	XN	XN	X	X	X	X
Pelagic cormorant	X	X	X	X	X	X	X	X	X	X	X	X
Pigeon guillemot				X	X	X	X	X	X			
Common murre				X	X	X	X	X	X			
Mew gull				X	X	X	X	X	X			
Arctic tern				X	X	X	X	X	X			
Semipalmated plover				X	X	X	X	X	X			
Horned grebe	X	X	X	X	X				X	X	X	X
Greater white-fronted goose			X	X	X				X	X	X	
Snow goose			X	X	X			X	X	X	X	
Canada goose			X	X	X	X	X	X	X	X	X	
American wigeon			X	X	X			X	X	X	X	
Mallard	X	X	X	X	X	X	X	X	X	X	X	X
Green-winged teal			X	X	X	X	X	X	X	X	X	
Ring-necked duck			X	X	X				X	X	X	
Harlequin duck	X	X	X	X	X	X	X	X	X	X	X	X
Surf scoter	X	X	X	X	X	X	X	X	X	X	X	X
White-winged scoter	X	X	X	X	X	X	X	X	X	X	X	X
Northern shoveler			X	X	X	X	X	X	X	X	X	
Pacific loon	X	X	X	X	X	X	X	X	X	X	X	X
Common loon	X	X	X	X	X	X	X	X	X	X	X	X
Spotted sandpiper				X	X	X	X	X	X			
Northern harrier	X	X	X	X	X	X	X	X	X	X	X	X
Greater yellowlegs	X	X	X	X	X	X	X	X	X	X	X	X
Short-tailed albatross[2]	X									X	X	X
Bald eagle	XF	XF	XF	XF N	XF N	XF NH	XF NH	XF N	XF	XF	XF	X F
Dark-eyed junco	X	X	X	X	X	X	X	X	X	X	X	X
Seabirds	X	X	X	X	X	X	X	X	X	X	X	X
Waterfowl and shorebirds	X	X	X	XN	XN	XN	XN	X	X	X	X	X
Fish												
Coho salmon	XE	XE	XE	X	X	X	X	X	XS	XS	XS E	X E
Sockeye salmon	XE	XE	XE	X	X	X	XS	XS	XS	XE	XE	X E
Pink salmon	XE	XE	XE	X	X	X	XS	XS	XS	XE	XE	X E
Chinook salmon	XE	XE	XE	X	X	X	XS	S	XS	XE	XE	X E
Chum salmon	XE	XE	XE	X	X	X	XS	XS	XS	XE	XE	X E
Dolly varden	XE	XE	XE	X	X	X	X	XS E	XS E	XS E	XS E	X E
Eulachon	X	X	XS	XS	XS	XE						
Steelhead trout	X	X	X	X	X	X	X	X	X	X	X	X

	Month											
Species	**J**	**F**	**M**	**A**	**M**	**J**	**J**	**A**	**S**	**O**	**N**	**D**
Threespine stickleback	X	X	X	X	X	X	X	X	X	X	X	X
Pacific herring	X	X	XS	XS	XS	X	X	X	X	X	X	X
Cutthroat trout	X	X	XS	XS	XS E	XS E	XE	X	X	X	X	X
Pacific lamprey	X	X	X	X	X	X	X	X	X	X	X	X
Marine Mammals												
Sea otter	X	X	XP	XP	XP	X	X	X	X	X	X	X
Harbor porpoise	X	X	X	X	X	X	X	X	X	X	X	X
Dall porpoise	X	X	X	X	X	X	X	X	X	X	X	X
Killer whale	X	X	X	X	X	X	X	X	X	X	X	X
Humpback whale[2]	X	X	X	X	X	X	X	X	X	X	X	X
Steller sea lion[2]	X	X	X	X	XP	XP	X	X	X	X	X	X
Harbor seal	X	X	X	X	XP	XP	X	XM	XM	X	X	X
Terrestrial Mammals												
Brown bear	D	D	D	XD	XD	X	X	X	XD	D	D	D
Black bear	D	D	D	XD	XD	X	X	X	XD	D	D	D
Sitka black-tailed deer	X	X	X	X	X	X	X	X	X	X	X	X
Moose	X	X	X	X	X	X	X	X	X	X	X	X
River otter	X	X	X	X	X	X	X	X	X	X	X	X
Lynx	X	X	X	X	X	X	X	X	X	X	X	X
Coyote	X	X	X	X	X	X	X	X	X	X	X	X
Wolf	X	X	X	X	X	X	X	X	X	X	X	X
Wolverine	X	X	X	X	X	X	X	X	X	X	X	X

Sources: (NOAA 2001) (USFWS 2022) (ADF&G 2022b) (ADF&G 2022c) (ADF&G Habitat Section 2023) and (Audubon Society 2010)

[1] See the Audubon Society Haines Town Center, AK checklist for a complete list of birds in the area.

[2] Endangered species

N = Nesting
H = Hatching
F = Fledging
D = Denning
E = Eggs
S = Spawning
P = Pupping
M = Molting
X = Multiple, undetermined

3.10.2 Subsistence Activities

Subsistence activities that take place in the Haines area are depicted in the table below.

Table 3.10.2-1 Subsistence Activities in Haines Area

Activity	Time of Year	Location
Hunting	Late Summer/Fall/Early Winter	Upland and intertidal areas
Berry Gathering	Late summer	Upland areas
Shellfish Gathering	Limited/Year-Round	Intertidal areas
Shell Pot Fishing	Year Round	Lutak Inlet
Salmon Fishing	Summer/Fall	Bays, beaches, and rivers
Herring Fishing	Limited/Spring	Near shore areas
Waterfowl harvesting	Fall	Bays and marshes
Aquatic Plants	Limited/Year-Round	Limited beaches/Aquatic Farm
Groundfish	Limited/Year-Round	Open Water

For information on harvest regulations, contact ADF&G, Subsistence Division or the USFWS Office of Subsistence Management. Subsistence uses in the area are extensive and vary by season, resource, and village. Some information about subsistence uses is community sensitive. Contacts for these resources and basic information about commercial fisheries are listed in the Southeast Alaska ACP, Section 9730.1.

3.10.3 Mitigating Seasonal Effects

Highly toxic products will become less toxic to the environment as they are exposed to the open atmosphere because the most toxic components of the products (benzene, xylene, toluene, and/or hexane) are subject to severe evaporation. Seasonal conditions may affect the toxicity of these products if they are spilled into the environment as follows:

- Extreme wind may accelerate natural evaporation rates, decreasing toxicity
- Heavy sea conditions may increase natural dispersion rates
- Extreme cold may slow the rate of travel of the discharge over land
- Ice and snow conditions may slow the spread of discharged product
- Heavy rainfall may increase natural dispersion and decrease toxicity by dilution
- Increased dispersion/mixing due to heavy sea states may increase toxicity in the water column

3.10.4 Toxicity

The products that can potentially be stored at the Haines Bulk Facility are listed in the table below along with how the State of Alaska, in 18 AAC 75.640, .650 and .660, categorizes those products as follows:

Table 3.10.4-1 Product Toxicity

Product Type	Toxicity	Degradability	Dispersibility
Gasoline	High	High	High
Diesel	High	High	High
Jet Fuel	High	High	High

The following table summarizes the lethal oil toxicity for marine organisms.

Table 3.10.4-2 Potential Effects of Oil on Marine Plants and Animals

Estimated Amount (ppm) of Various Petroleum Substances Containing Equivalent Amounts of Soluble Aromatic Hydrocarbon Derivation				
Class of Organisms	**Estimated Conc. (ppm) of S.A.D. Causing Toxicity**	**#2 Fuel Oil (Est. Max. % S.A.D. = 1-30)**	**Kerosene (Est. Max. % S.A.D. = 1-20)**	**Residual (Est. Max. % S.A.D. = 0-1)**
Flora (plant life)	10-100	50-500	102-103	103-00 (no effect)
Finfish	5-50	25-250	50-500	500-00
Larvae (all species)	0.1-1.0	0.5-5	1-10	10-00
Pelagic Crustaceans (shellfish)	1-10	5-50	10-100	102-00
Gastropods (snails)	10-100	50-500	102-103	103-00
Bivalves (clams, mussels)	5-50	25-250	50-500	500-00
Benthic Crustaceans	1-10	5-50	10-100	102-00
Other Benthic Organisms (Polychaetes, etc.)	1-10	5-50	10-100	102-00

a Soluble aromatic hydrocarbon derivatives (mono- and dicyclic aromatics, naphtheno-aromatics).
b Based on a review of the literature by Moore et al. (1973) and their estimates of S.A.D. in the bioassay solutions.
Source: Hyland and Schneider, 1976 (adoption with modifications from Moore, 1973).

3.10.5 Sensitive Receiving Environments

The Southeast Alaska ACP, GRSs, and the Alaska Sensitive Areas Compendium are resources for identifying sensitive areas which may be affected by an oil spill as well as the distribution of marine resources and the location of subsistence activities described through a series of tables and maps referenced below. Each of the documents discussed previously can be accessed from a weblink to the Area Plan References and Tools website located in Section 3.11 of this CPLAN.

The ADNR has digital base and land management maps for each area of the state. The land management maps and geographic information systems data can be accessed from a weblink to the Area Plan and References Tools website location in Section 3.11 of this CPLAN.

3.10.6 Identified Environmentally Sensitive Areas

There are a number of ESAs near the Haines Bulk Facility that may be threatened in the event of a large release into the waters of Lutak Inlet and potentially into the Chilkoot Inlet (ADEC 2022b). It is the responsibility of the IOSC to determine which sites will require protection in the event of a spill at the facility. ESAs and GRSs in the region include:

- Chilkoot River, SE08-03
- Portage Cove, SE08-05
- Ferebee River
- Haines small boat harbor
- Haines coastline due to the commercial and recreational fishing in the area
- Public drinking water supply, AK2110855

See Figure 3.10-1 for locations of ESAs in relation to the Haines Facility.

See Appendix B for GRSs in the region.

3.10.7 Endangered Animals/Critical Habitat Areas

There are three endangered/threatened species whose ranges overlap with the Haines area. Information regarding these three species is discussed below.

Short-tailed albatross and humpback whales are listed as endangered under the Endangered Species Act. Steller sea lions are listed as endangered only if they are west of 144°W longitude and the entire population is listed as threatened. The Steller sea lions in the Haines area are east of the 144°W longitude and therefore threatened. All three species can be found in Lutak Inlet and their ranges overlap with the planning distance,

but their designated critical habitats do not. There are no critical habitats located within 25 miles of the facility (ADF&G 2022a) and (ADF&G 2022b).

Figure 3.10-1 includes the locations of ESAs in the region, including waterfowl, marine mammals, and brown bears concentrations along with other pertinent ESAs near the facility.

Potential sensitive areas and other areas of concern that may be affected by an oil spill from the Haines Bulk Facility are presented in the summary table below.

The ADEC Area Plan and Reference Tools website (see section 3.11 of this CPLAN for a link) has links to pertinent information regarding ESA, including information on endangered species in the region.

Table 3.10.7-1 Potential Sensitive Areas Near the Haines Facility

Site	Characteristics of Area	Method of Protection	Boom Required	Site Access
Potential Sensitive Areas				
Anadromous streams located near the facility	Exposed tidal flats and sheltered, impermeable rocky shores	Exclusion boom	Up to 500’	Marine/fresh waters
Geographic Response Strategies				
Chilkoot River (SE08-03)	Waterway with exposed tidal flats, mixed sand and gravel beaches, intertidal marshes, and sheltered, impermeable rocky shores	Snare line, protected-water boom, diversion boom, free oil recovery, and passive recovery and debris removal	Up to 5,000’	Marine waters
Portage Cove (SE08-05)	Waterway with mainly gravel beaches (granules to cobbles), with some sheltered, impermeable rocky shores and intertidal marshes	Diversion booming, protected-water boom, free-oil recovery, and shoreside recovery	Up to 1,200’	Marine waters

Figure 3.10-1 Environmentally Sensitive Areas

Figure 3.10-1 Environmentally Sensitive Areas

Current to: 10/28/2022
Author: Integrity Environmental LLC
http://www.integrity-env.com

Haines Bulk Facility
Delta Western, LLC
Within: Sec. 10, T. 30 S., R. 59 E.,
Copper River Meridian, Alaska.
Bulk Facility: 59 16' 50.055" N
135 28' 6.22"W
USGS 63K Quad: Skagway B-2
Coordinate System:
NAD 1983 Alaska Albers
Data Source: ADEC 2022b

5-Mile Planning Distance
Bulk Facility and Lutak Dock

Geographic Response Strategies
Chilkoot River
Portage Cove

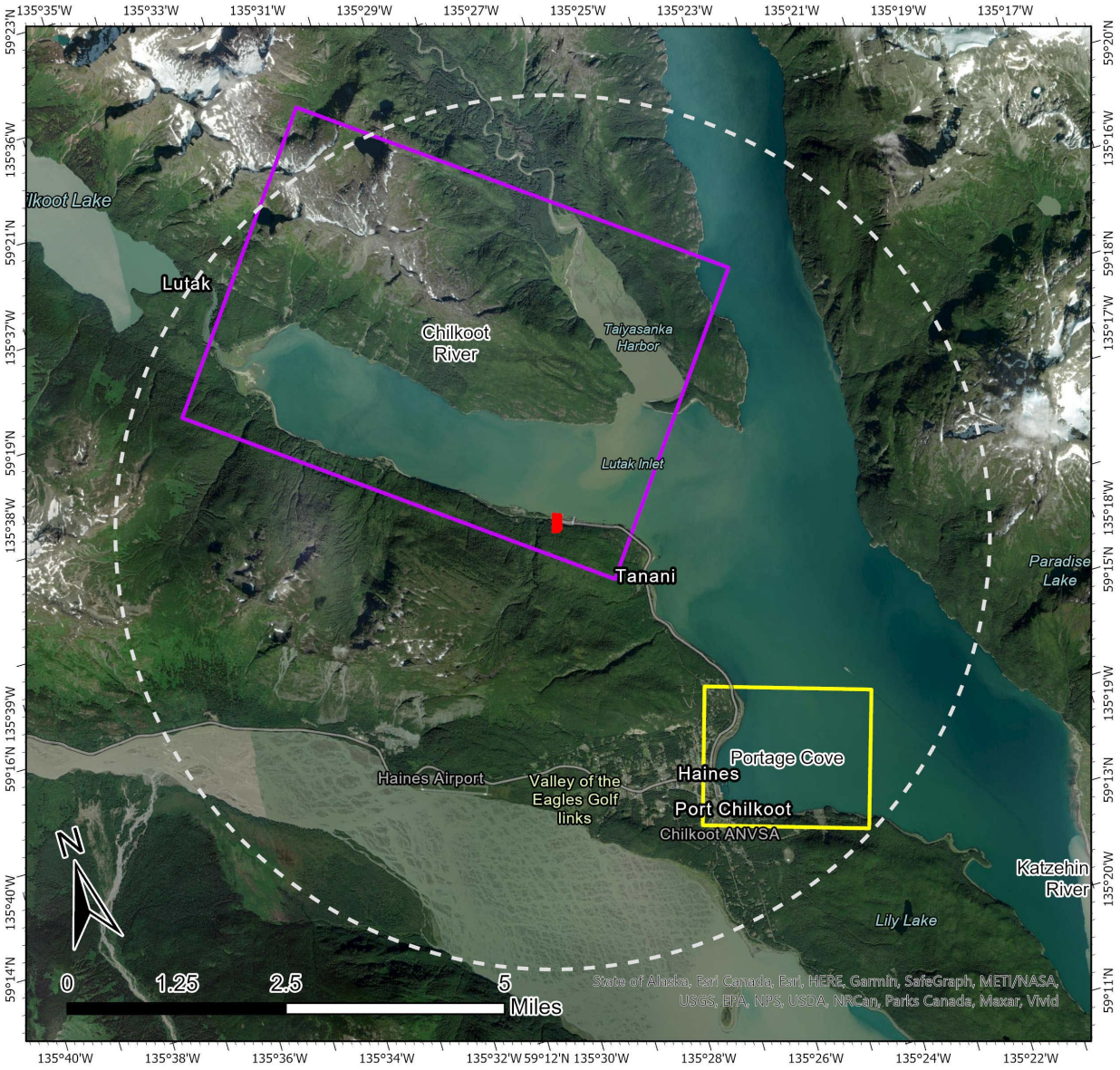
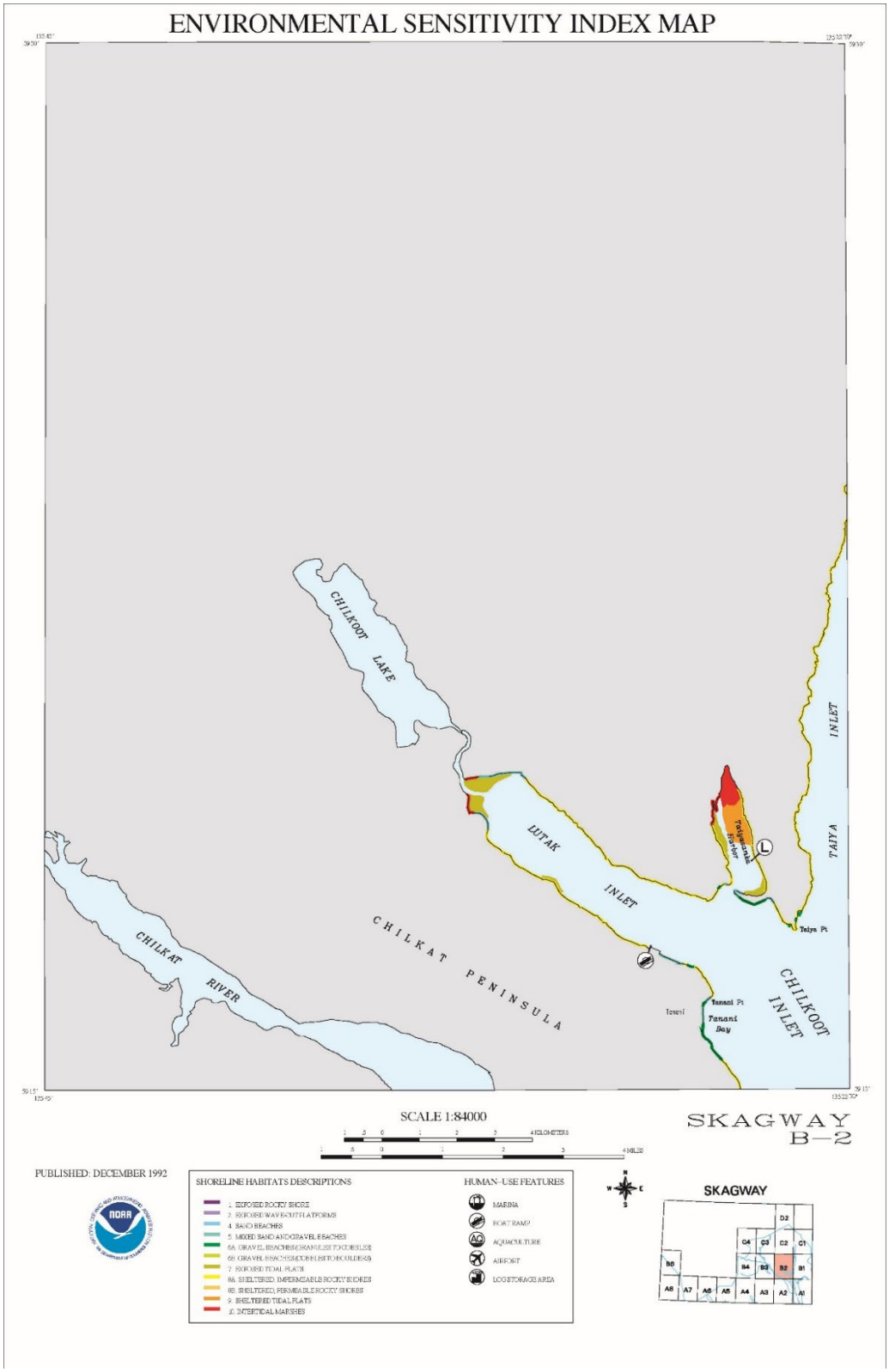


Figure 3.10-2 Environmental Sensitivity Index Map



3.10.8 Anadromous Waters

Salmon and other anadromous fish spawn in many of the streams and rivers that drain into the facility's surrounding waters/wetlands. See Figure 3.10-3 for a map of most anadromous waters within five miles of the DW Haines Facility. The sites most likely to be impacted by an oil spill from the facility are listed in the table below.

Table 3.10.8-1 Anadromous Waters Near the Haines Facility

Stream Name	AWC Stream Code	Stream Location (in relation to facility)	Species
Chilkoot River	115-33-10200	3.75 miles north northeast	Chum salmon (present) Chinook salmon (present) Coho salmon (present) Pink salmon (present, spawning) Sockeye salmon (present) Cutthroat trout (present) Dolly Varden (present) Eulachon (smelt)
Ferebee River	115-33-10650	2.5 miles north northeast	Coho salmon (present) Dolly Varden (present) Eulachon (present)
Little Ferebee River	115-33-10650-2001	3.20 miles north northeast	Coho salmon (present) Dolly Varden (present)
Mink Creek	115-34-10900	1.75 miles southeast	Coho salmon (rearing)
Unnamed Creek	115-33-10198	3.5 miles north northwest	Pink salmon (spawning)

Source: ADF&G 2022a

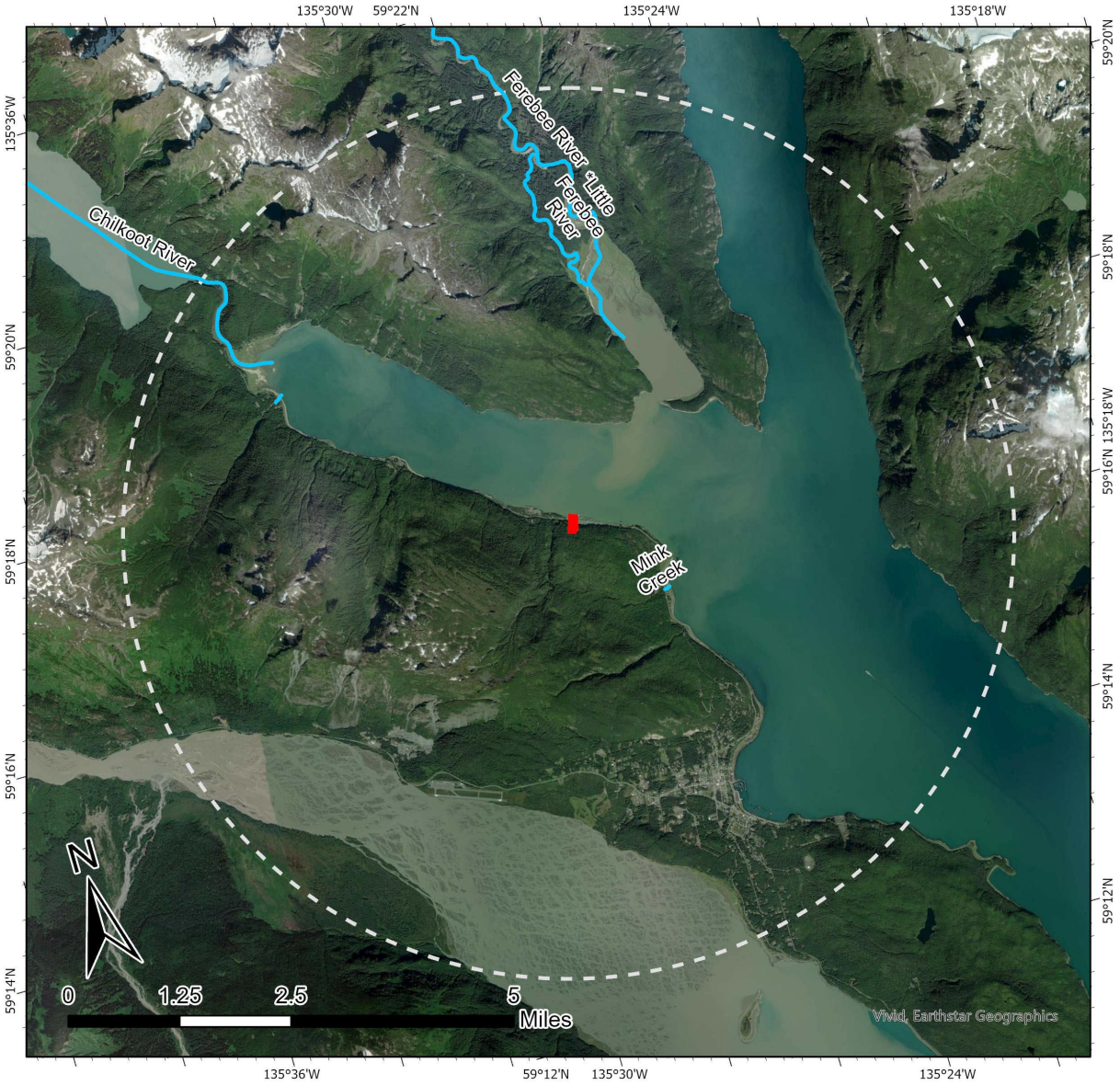
Figure 3.10-3 Anadromous Waters

Figure 3.10-3 Anadromous Waters

Current to: 10/28/2022
Author: Integrity Environmental LLC
http://www.integrity-env.com

Haines Bulk Facility
Delta Western, LLC
Within: Sec. 10, T. 30 S., R. 59 E.,
Copper River Meridian, Alaska.
Bulk Facility: 59 16' 50.055" N
135 28' 6.22" W
USGS 63K Quad: Skagway B-2
Coordinate System:
NAD 1983 Alaska Albers
Data Source: ADF&G 2021

Anadromous Stream
Bulk Facility and Lutak Dock
5-Mile Planning Distance



3.10.9 Protection of Areas of Public Concern

The Southeast Alaska ACP provides ample details on areas of public concern near the Haines Facility. See the ACP for details on each of the human uses with locations, contact information, and resources of concern information (ADEC 2021). Listed below are the human resource uses near the facility:

Areas of Major Concern

- Cultural resources
- Subsistence and personal use harvests
- Commercial fishing
- Marinas and ports
- Commercial tourism
- State Parks
- Eulachon spawning areas
- Herring spawning areas
- Harbor seal haulouts
- Large anadromous fish streams (Chilkoot River)

Areas of Moderate Concern

- Recreational sites and facilities

Areas of Lesser Concern

- Sport fishing and hunting

For information on harvest regulations, contact ADF&G, Subsistence Division or the USFWS Office of Subsistence Management. Subsistence uses in the area are extensive and vary by season, resource, and village. Some information about subsistence uses is community sensitive. Contacts for these resources and basic information about commercial fisheries are listed in Part 1 of the Alaska Sensitive Areas Compendium (see Section 3.11 for a link to the Area Plan References and Tools website where there is a link to the Alaska Sensitive Areas Compendium).

3.10.10 Cultural Resources

Many archaeological and historical sites have been reported in Southeast Alaska. Caution should be used in any cleanup operation to not disturb or impact any historical or archaeological sites during response. Part Five of The Alaska Regional Contingency Plan outlines Federal On-Scene Coordinator responsibilities for protecting cultural resources and provides an expedited process for compliance with Section 106 of the National Historic Preservation Act during the emergency phase of a response. If there is no FOSC, then DW will coordinate with the State On Scene Coordinator (SOSC), the State Historic Preservation Officer (SHPO), and other appropriate land managers. If previously

undiscovered artifacts or areas of historic, prehistoric, or archaeological importance are encountered, the ADNR Division of Parks and Outdoor Recreation and the Office of History and Archaeology (907-269-8721) shall be notified.

The Alaska Implementation Guidelines for the Protection of Historic Properties is available on the Area Plan References and Tools website See Section 3.11 of this CPLAN for a link.

3.11 Additional Information

18 AAC 75.425(e)(3) (K) ADDITIONAL INFORMATION - other information necessary to provide background for or verification of the plan contents; and

The following references are provided in support of this CPLAN:

- Report a Spill information Website with link: https://dec.alaska.gov/spar/ppr/spill-information/reporting
- Transport, Treatment, & Disposal Approval Form for Contaminated Media link: http://dec.alaska.gov/spar/guidance.htm#rplans
- Additional information on protection of historic properties during spill response: https://www.achp.gov/sites/default/files/2018-12/OilQandA.pdf
- Alaska Regional Contingency Plan: https://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/
- Area Plan and References Tools website: https://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/tools/
    - Use this link to access the following documents:
        - Wildlife Protection Guidelines
        - Sensitive Areas Compendium
        - UC Decanting
        - Alaska Mapper
        - Geographic Zone
        - The Alaska Implementation Guidelines for the Protection of Historic Properties
        - STAR Manual
        - Job Aid: Waste Management and Disposal
- Alaska Spill Response Permits Tools: https://dec.alaska.gov/spar/ppr/response-resources/permits-tool/
- SEAPRO Technical Manual: https://www.seapro.org/techMan/SEAPRO_TechManHome.html
- WebGNOME: https://gnome.orr.noaa.gov/#

3.12 Bibliography

18 AAC 75.425(e)(3) (L) BIBLIOGRAPHY - a list of data and information sources used to determine the information contained in the plan;

ADEC (Alaska Department of Environmental Conservation). 2014. Spill tactics for Alaska responders (STAR) manual. Alaska Department of Environmental Conservation, Division of Spill Prevention and Response, Prevention Preparedness https://dec.alaska.gov/media/11550/star-manual.pdf (Accessed September 13, 2022).

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4 BEST AVAILABLE TECHNOLOGY

18 AAC 75.425(e)(4)	**Part 4 - Best Available Technology Review: Unless application of a state requirement would be preempted by federal law, the plan must provide for the use of the best available technology consistent with the applicable criteria in 18 AAC 75.445(k). In addition, the plan must**
18 AAC 75.425(e)(4)(A)	**identify technologies applicable to the applicant's operation that are not subject to response planning or performance standards specified in 18 AAC 75.445(k)(1) and (2);**
18 AAC 75.425(e)(4)(B)	**for each applicable technology under (A) of this paragraph, identify all available technologies and include a written analysis of each technology, using the applicable criteria in 18 AAC 75.445(k)(3); and**
18 AAC 75.425(e)(4)(C)	**include a written justification that the technology proposed to be used is the best available for the applicant's operation.**
18 AAC 75.425(f)	**For purposes of this section and 18 AAC 75.445, "technology" means equipment, supplies, other resources, and related practices.**

The following subsections each contain a table providing the Best Available Technology (BAT) review for each applicable technology at the Haines Bulk Facility. Each table is followed by a summary statement.

4.1 Field Communications

18 AAC 75.425(e)(4)(A)(i) Communications described under (1)(D) of this subsection;

18 AAC 75.425(e)(1)(D) Communications — a description of field communications procedures, including, if applicable, assigned radio channels or frequencies and their intended use by response personnel;

Table 4.1-1 BAT: Field Communications

Evaluation Criteria	Existing Method 1	Existing Method 2	Alternate Option 1
DESCRIPTION	VHF handheld radios and cellular phones are used for communications and is widely used in the oil industry, See Section 1.4 of this CPLAN.	SEAPRO VHF and Satellite phone. See SEAPRO's website for most current list.	Video camera with emergency response base units, highly sophisticated units.
A) AVAILABILITY: i) Is the technology the best in use in other similar situations?	Yes, technology is readily available and used extensively in the oil industry and at DW.	Yes, technology is readily available and used extensively in oil spill cleanup.	Video camera with emergency response base units, highly sophisticated units.
ii) Is the technology available for use by the applicant?	Yes, the technology is in use by DW.	Yes, SEAPRO maintains equipment and is available to DW.	Operating from satellites. Technology under development with Department of Defense.
B) TRANSFERABILITY: i) Can the technology be applied to the applicant's operation?	Yes, the technology is used for spill response and day-to-day operations.	Yes, SEAPRO is contracted to provide DW with spill response resources which may include communications equipment.	This technology is not transferable to DW.
C) EFFECTIVENESS: Is there a reasonable expectation that the technology will provide increased spill prevention or other environmental benefits?	Yes, technology is effective for providing increased spill prevention. Example: communicating to stop a transfer of oil	It is reasonable to expect that SEAPRO will provide added communication support in an emergency event	Not available to DW.

Evaluation Criteria	Existing Method 1	Existing Method 2	Alternate Option 1
	before a tank overfills.	which may prevent the spread of spilled oil.	
D) COST: i) Cost of achieving BAT. ii) Consideration of cost in relation to remaining years of service of current technology in use by applicant.	Current technology used is BAT. Technology used is replaced when the service life ends. New equipment meets standards in place when replaced.	Cost to DW is dependent on the incident response location and length of time of rental.	No cost as technology not available.
E) AGE & CONDITION: of existing technology. Consider: Relative to similar equipment in current or past use under similar circumstances.	The existing technology has been used in the oil industry for decades.	SEAPRO always maintains updated communication equipment on hand for response purposes.	Unknown.
F) COMPATIBILITY: Is the technology compatible with existing operations?	Yes, technology used is compatible with current communication requirements at the facility.	Technology is compatible with existing DW system of communication. Radios can be coordinated to have correct DW frequency.	Not compatible with existing DW facility.
G) FEASIBILITY: Feasibility of this technology from an engineering and operational view.	Technology is feasible for use at this facility.	This technology is feasible with DW current communication system.	Not feasible due to costs and the small size of facility.
H) ENVIRONMENTAL IMPACTS: Does the use of this technology impact the environment in a manner that offsets the technology's benefits?	No. This technology is BAT for portable communications within the facility and beyond.	None associated with SEAPRO communication system other than transportation effects of air and noise pollution to get equipment to site.	None.

Summary: VHF Radios and cell phones are the BAT within the oil industry.

4.2 Trajectory Analysis and Forecasts

18 AAC 75.425(e)(4)(A)(i) **Trajectory analyses and forecasts described under (1)(F)(iv) of this subsection;**

18 AAC 75.425(e)(1)(F)(iv) **Procedures and methods for real-time surveillance and tracking of the discharged oil on open water and forecasting of its expected points of shoreline contact.**

Table 4.2-1 BAT: Trajectory Analysis and Forecasts

Evaluation Criteria	Existing Method 1	Existing Method 2	Existing Method 3	Existing Method 4
DESCRIPTION	The facility utilizes a small boat or beach tracking to track discharges visually in conjunction with aerial surveillance as needed. See Section 1.6 Scenario.	Aerial tracking of discharge by use of helicopter and communication system. See Section 1.6 Scenario.	Aerial tracking of discharge by use of waterproof drone. See Section 1.6 Scenario.	NOAA WebGNOME spill modeling
A) AVAILABILITY: i) Is the technology the best in use in other similar situations?	Technology is readily available and used extensively in the oil spill response.	Technology is readily available and used extensively in the oil spill response.	Technology is readily available in Southeast Alaska and is starting to be used extensively in oil spill response.	Technology is available and used extensively in oil spill response.
ii) Is the techno-logy available for use by the applicant?	Yes.	Yes.	Yes.	Yes.
B) TRANSFER-ABILITY: i) Can the technology be applied to the	The technology is used at the DW facility.	Yes.	Yes.	Yes.

Evaluation Criteria	Existing Method 1	Existing Method 2	Existing Method 3	Existing Method 4
applicant's operation?				
C) EFFECTIVE-NESS: Is there a reasonable expectation that the technology will provide increased spill prevention or other environmental benefits?	Existing discharge tracking system works quite well even in darkness, some weather limitations but has been effective since its origin and is used throughout AK.	Aerial tracking of oil discharge is very effective for sighting entire area. Some weather restrictions for flying helicopter make for ineffectiveness.	Aerial tracking of oil discharge is very effective for sighting entire area. Real time streaming video and photos are provided while the drone is in the air. There are limitations if visibility is low or there are high winds, but the method can be effective. The drone is operable in winds up to 45 mph.	The spill model is most effective for determining the trajectory of a release in open ocean.
D) COST: i) Cost of achieving BAT. ii) Consideration of cost in relation to remaining years of service of current technology in use by applicant.	Cost of purchasing boat. Maintenance costs are considered part of annual budget planning.	Aerial tracking with helicopter is approximately $600/hr. Existing technology in use provides just as accurate tracking but at less cost.	The cost of using a drone is significantly lower than chartering an overflight with an airplane or helicopter. The cost is estimated at $1,000 to purchase and ongoing maintenance costs as needed.	Model is free. No costs incurred.
E) AGE & CONDITION: of existing technology. Consider: Relative to similar equipment	Existing condition is excellent. The boat is well maintained and ready to operate	Aerial tracking has been used since helicopters have been in existence.	Aerial tracking with use of drones is relatively new. It is safer than using a manned	GNOME was originally released in 2002. The program is continually

Evaluation Criteria	Existing Method 1	Existing Method 2	Existing Method 3	Existing Method 4
in current or past use under similar circumstances.	at a moment's notice.	Helicopters deployed would meet safety requirements of FAA.	helicopter, and the drones are used in compliance with FAA requirements.	updated, and new location files are added occasionally.
F) COMPATI-BILITY: Is the technology compatible with existing operations?	Yes	This technology is compatible and being used as stated in the discharge tracking plan.	This technology is compatible.	Technology is compatible with facility operations.
G) FEASIBILITY: Feasibility of this technology from an engineering and operational view.	Technology is feasible for use at this facility.	This technology feasible if the helicopter is available immediately once the discharge is noticed. Random flights with the helicopter may be necessary to track during incremental weather.	Technology is feasible if the drone is available immediately once the discharge is discovered. Random flights with the drone may be necessary to track during incremental weather.	This technology is feasible.
H) ENVIRON-MENTAL IMPACTS: Does the use of this technology impact the environment in a manner that offsets the technology's benefits?	No.	No.	No.	No.

Summary: Current technologies are readily available and used extensively in oil spill response meeting BAT.

4.3 Wildlife Capture, Treatment, & Release Methods

18 AAC 75.425(e)(4)(A)(i) **Wildlife capture, treatment, and release procedures and methods described under (1)(F)(xi) of this subsection;**

18 AAC 75.425(e)(1)(F)(xi) **Procedures and methods for the protection, recovery, disposal, rehabilitation, and release of potentially affected wildlife, including: minimizing wildlife contamination through hazing or other means, when appropriate; the recovery of oiled carcasses to preclude secondary contamination of scavengers; and the capture, cleaning, rehabilitation, and release of oiled wildlife, when appropriate.**

If marine mammals are present and require assistance, the appropriate agency will be contacted for guidance.

Table 4.3-1 BAT: Wildlife Capture, Treatment, & Release Methods

Evaluation Criteria	Existing Method 1	Existing Method 2	Existing Method 3
DESCRIPTION	Contract with SEAPRO to provide wildlife hazing/protection through subcontracts with IBR and IWR.	Contracting additional ADEC & ADF&G approved wildlife cleanup and rehabilitation organizations as needed to address specific wildlife species types.	Contract with SEAPRO to provide oiled marine and terrestrial mammal care through a subcontract with IWR.
A) AVAILABILITY: i) Is the technology the best in use in other similar situations?	Technology is readily available and used extensively in the oil spill response.	Technology is readily available and used extensively in the oil spill response.	Technology is readily available and used extensively in the oil spill response.
ii) Is the technology available for use by the applicant?	Yes.	Yes.	Yes.

Evaluation Criteria	Existing Method 1	Existing Method 2	Existing Method 3
B) TRANSFERABILITY: i) Can the technology be applied to the applicant's operation?	Yes.	Yes.	SEAPRO is contracted to DW and is listed as part of the response team. SEAPRO has a contract with IWR for marine and terrestrial mammal response.
C) EFFECTIVENESS: Is there a reasonable expectation that the technology will provide increased spill prevention or other environmental benefits?	It is reasonable to expect that SEAPRO, IBR, and IWR will provide hazing, capture, stabilization and rehabilitation support in a spill response event.	It is reasonable to expect that contractor would provide requested support in a spill event.	It is reasonable to expect that contractor would provide requested support in a spill event.
D) COST: i) Cost of achieving BAT. ii) Consideration of cost in relation to remaining years of service of current technology in use by applicant.	Cost is dependent on incident.	Cost is dependent on incident.	Cost is dependent on incident.
E) AGE & CONDITION: of existing technology. Consider: Relative to similar equipment in current or past use under similar circumstances.	SEAPRO maintains bird hazing and bird and otter capture equipment on hand at all times for response purposes. IBR and the IWR staff are professionally trained and use field tested and agency approved methods for hazing and wildlife protection.	Dependent on contract at the time of incident.	Dependent on contract at the time of incident.
F) COMPATIBILITY: Is the technology compatible with existing operations?	Technology is compatible with existing spill response practices for wildlife.	Technology is compatible with existing spill response practices for wildlife.	Technology is compatible with existing spill response practices for wildlife.

Evaluation Criteria	Existing Method 1	Existing Method 2	Existing Method 3
G) FEASIBILITY: Feasibility of this technology from an engineering and operational view.	Technology is feasible for use at this facility during spill response activities.	Technology is feasible for use at this facility during spill response activities.	Technology is feasible for use at this facility during spill response activities.
H) ENVIRONMENTAL IMPACTS: Does the use of this technology impact the environment in a manner that offsets the technology's benefits?	No.	No.	No.

Summary: Current technologies are readily available and used extensively in oil spill response meeting BAT. All technologies consult the Wildlife Protection Guidelines for Oil Spill Response in Alaska (version 2020.1), which are available at: http://dec.alaska.gov/spar/ppr/contingency-plans/response-plans/tools/.

4.4 Discharge Source Control Procedures

18 AAC 75.425(e)(4)(A)(i) Source control procedures to stop the discharge at its source and prevent its further spread described under (1)(F)(i) of this subsection.

18 AAC 75.425(e)(1)(F)(i) Source control procedures to stop the discharge at its source and prevent its further spread.

Table 4.4-1 BAT: Discharge Source Control Procedures

Evaluation Criteria	Existing Method 1	Existing Method 2	Existing Method 3
DESCRIPTION	Stop the flow: shut valves, shut off pumps, plug flow. Stabilize by berm construction, boom deployment See Section 1.6.	Patch kits are readily available; and the pipe patch kits are on site. The tank patch kit is a magnetic patch is attached over the leak; this is not onsite but can be procured if needed.	SEAPRO response team.
A) AVAILABILITY: i) Is the technology the best in use in other similar situations?	Technology is readily available and used extensively in the oil industry and at DW.	Technology is readily available and used extensively in the oil industry.	Technology is best in use in region.
ii) Is the technology available for use by the applicant?	Technology is in use by DW.	Technology is in use by DW.	Yes.
B) TRANSFERABILITY: i) Can the technology be applied to the applicant's operation?	Technology is used at the DW Facility.	Technology is used at the DW Facility.	SEAPRO is contracted to DW, and resources can be integrated into a DW spill response.
C) EFFECTIVENESS: Is there a reasonable expectation that the technology will provide increased spill prevention or other environmental benefits?	Technology is effective for mitigating the effects of a spill.	The tank tourniquet is of limited use. It can only be applied as one large patch and may not conform to leak. Magnetics may not be strong enough to plug leak.	It is reasonable to expect that SEAPRO will provide added containment resources to prevent spread of oil.

Evaluation Criteria	Existing Method 1	Existing Method 2	Existing Method 3
D) COST: i) Cost of achieving BAT. ii) Consideration of cost in relation to remaining years of service of current technology in use by applicant.	No additional cost for DW personnel wages or resources to prevent further spread as they are normally stocked. Equipment is replaced with current technology at the time of replacement and budgeted.	$2,000 for tank tourniquet; pipe kits are at the facility.	Cost is dependent on incident.
E) AGE & CONDITION: of existing technology. Consider: Relative to similar equipment in current or past use under similar circumstances.	The existing technology has been used in the oil industry for decades.	The existing technology has been used in the oil industry for decades.	SEAPRO maintains updated equipment and trained personnel on hand at all times for response purposes.
F) COMPATIBILITY: Is the technology compatible with existing operations?	Yes, technology used is compatible with current operations at the facility.	Yes, technology used is compatible with current operations at the facility.	Technology is compatible with existing DW system of response. Equipment & personnel can be coordinated within DW response.
G) FEASIBILITY: Feasibility of this technology from an engineering and operational view.	Technology is feasible for use at this facility.	Technology is feasible for use at this facility.	Technology is feasible for use at this facility.
H) ENVIRONMENTAL IMPACTS: Does the use of this technology impact the environment in a manner that offsets the technology's benefits?	No.	No.	No.

Summary: Personnel prompt response actions and use of containment equipment is BAT.

4.5 *Corrosion Control System for Tanks (constructed before May 14, 1992)*

18 AAC 75.425(e)(4)(A)(ii)	**Cathodic protection or another approved corrosion control system if required by 18 AAC 75.065.(h)(2), (i)(3), or (j)(3)**
18 AAC 75.065(h)(2)	**Cathodic Protection or another approved corrosion control system. For an installation placed in service before 05-14-1992, shall, operate and maintain after 12-30-2007, the CP system on each FCAST consistent with Section 11, NACE RP 0193-2001; a corrosion expert or qualified CP protection tester shall perform a CP survey specified under that standard.**

Not applicable. Tank bottoms are not in contact with soil eliminating conductivity and the need for cathodic protection. See Section 2.1.5 of this CPLAN for more information.

4.6 Means of Immediately Determining Liquid Level of FCASTs

18 AAC 75.425(e)(4)(A)(ii) — **A means of immediately determining the liquid level of bulk storage tanks as specified in 18 AAC 75.065(k)(3) and (4);**

18 AAC 75.065 (k)(3) and (4) — **For a FCAST provide one or more means of immediately determining the liquid level of each bulk storage tank.**

Table 4.6-1 BAT: Means of Immediately Determining Liquid Level of FCASTs

Evaluation Criteria	Existing Method 1	Alternate Option 1	Alternate Option 2
DESCRIPTION	Automatic Shand and Jurs Model 92021/Morrison Bros. level gauges and portable Outalaram Model A-100. See Section 2.1.5.	Digital level gauges	Servo gauges
A) AVAILABILITY: i) Is the technology the best in use in other similar situations?	Technology is readily available and used extensively in the oil industry and at DW.	Technology is readily available and used extensively in the oil industry and is comparable to float type auto gauges.	Technology is readily available and used extensively in the oil industry.
ii) Is the technology available for use by the applicant?	The technology is in use by DW.	Not at this time.	Not at this time.
B) TRANSFERABILITY: i) Can the technology be applied to the applicant's operation?	The technology is in use at the facility.	Yes, with compatible control box, electrical and cable conduit to top of tanks, and computer system.	Yes, with significant electronic modifications.
C) EFFECTIVENESS: Is there a reasonable expectation that the technology will provide increased spill prevention or other environmental benefits?	Technology is effective for mitigating the effects of a spill.	No.	No.

Evaluation Criteria	Existing Method 1	Alternate Option 1	Alternate Option 2
D) COST: i) Cost of achieving BAT. ii) Consideration of cost in relation to remaining years of service of current technology in use by applicant.	No cost – is existing technology. Very durable product. Maintenance is less than changing technology.	Approx. $25,000 per tank - complete electronics package.	Approx. $38,000 per tank – complete modification.
E) AGE & CONDITION: of existing technology. Consider: Relative to similar equipment in current or past use under similar circumstances.	This system has been proven to provide reliable service since installation and in other applications.	Technology has been used in the oil industry for decades.	Technology has been used in the oil industry for decades.
F) COMPATIBILITY: Is the technology compatible with existing operations?	Yes, technology used is compatible with current operations at the facility.	No.	No.
G) FEASIBILITY: Feasibility of this technology from an engineering and operational view.	Technology is feasible for use at this facility.	No. Requires significant energy to operate system.	No. Requires significant energy to operate system.
H) ENVIRONMENTAL IMPACTS: Does the use of this technology impact the environment in a manner that offsets the technology's benefits?	No.	No.	No.

Summary: Existing technology is effective and BAT for immediately determining the liquid levels in the tank, and for preventing FCAST overfills. Oil transfers are monitored; see oil transfer procedures in Section 2.1.4.

4.7 Means of Immediately Determining Liquid Level of SFASTs

18 AAC 425(e)(4)(A)(ii) **A means of immediately determining the liquid level of bulk storage SFAST as specified in 18 AAC 75.066(g)(1)(C) and (D);**

18 AAC 75.066 (g)(1)(C) and (D) **For a SFAST: Means of immediately determining the liquid level of each bulk storage tank if the liquid level is closely monitored; and high liquid level alarm.**

Table 4.7-1 BAT: Means of Immediately Determining Liquid Level of SFASTs

Evaluation Criteria	Existing Method 1	Alternative Option 1
DESCRIPTION	Automatic Shand and Jurs Model 92021/Morrison Bros. level gauges and portable Outalaram Model A-100. See Section 2.1.5.	Digital level gauges
A) AVAILABILITY: i) Is the technology the best in use in other similar situations?	Technology is readily available and used extensively in the oil industry and at DW.	Technology is readily available and used extensively in the oil industry and is comparable to float type auto gauges.
ii) Is the technology available for use by the applicant?	The technology is in use by DW.	Not at this time.
B) TRANSFERABILITY: i) Can the technology be applied to the applicant's operation?	The technology is in use at the facility.	Yes, with compatible control box, electrical and cable conduit to top of tanks, and computer system.
C) EFFECTIVENESS: Is there a reasonable expectation that the technology will provide increased spill prevention or other environmental benefits?	Technology is effective for mitigating the effects of a spill.	No.
D) COST: i) Cost of achieving BAT. ii) Consideration of cost in relation to remaining years of service of current technology in use by applicant.	No cost – is existing technology. Maintenance is less than changing technology.	It would be expensive to change to a digital system based on equipment and computing system cost of installation and maintenance.
E) AGE & CONDITION: of existing technology. Consider: Relative to similar equipment in current or past use under similar circumstances.	This system has been proven to provide reliable service since installation and in other applications.	Technology has been used in the oil industry for decades.

Evaluation Criteria	Existing Method 1	Alternative Option 1
F) COMPATIBILITY: Is the technology compatible with existing operations?	Yes, technology used is compatible with current operations at the facility.	No.
G) FEASIBILITY: Feasibility of this technology from an engineering and operational view.	Technology is feasible for use at this facility.	No. Requires significant energy to operate system.
H) ENVIRONMENTAL IMPACTS: Does the use of this technology impact the environment in a manner that offsets the technology's benefits?	No.	No.

Summary: Existing technology provides systems for immediately determining the liquid level of the tank and preventing a SFAST overfill. Oil transfers are monitored; see oil transfer procedures in Section 2.1.4.

4.8 *Maintenance Practices for Buried Piping*

18 AAC 75.425(e)(4)(A)(ii) **Maintenance practices for buried metallic piping containing oil as required by 18 AAC 75.080(b)**

18 AAC 75.080(b) **Maintain metallic facility oil piping containing oil in accordance with a corrosion control program.**

DW's maintenance practices for buried oil piping includes the existing coating; third-party, certified corrosion inspections at least once every three years, not to exceed 39 months; and an ongoing API 570 inspection schedule. These practices together represent the BAT. Therefore, no analysis is required or provided.

Whenever the pipe is exposed, it is inspected. Damaged or deteriorated sections are repaired or replaced. If there is corrosion damage, appropriate corrective steps are taken. Please refer to Section 2.1.7 of this CPLAN for further information on the corrosion control programs in place.

4.9 Protective Coatings & Corrosion Control Program for Aboveground Facility Piping

18 AAC 75.425(e)(4)(A)(ii)	**Protective coating and cathodic protection if required by 18 AAC 75.080(d), (k)(1), (*l*), or (m);**
18 AAC 75.080(l)	**Aboveground oil piping is protected from atmospheric corrosion with protective coating or use of corrosion-resistant material. *Applicable to aboveground piping.***
18 AAC 75.080(m)	**Aboveground piping at a soil-to-air interface shall provide protective coating or use of corrosion-resistant materials.**

DW's piping corrosion control program includes protection of above ground lines from atmospheric corrosion with a protective coating; piping at soil-to-air interface has appropriate protective coatings (tape wrap). These represent the BAT and are required by regulation.

Summary: Existing technologies are effective for preventing metal piping corrosion and is BAT.

5 RESPONSE PLANNING STANDARD

18 AAC 75.425(e)(5) PART 5 - RESPONSE PLANNING STANDARD: A calculation of the applicable response planning standards set out in 18 AAC 75.430 - 18 AAC 75.440 and 18 AAC 75.442, including a detailed basis for the calculation of reductions, if any, to be applied to the response planning standards.

The state regulations allow for calculation of a reduced response planning standard for prevention measures in place. Northern has taken credit for the following:

- Drug and Alcohol Testing of key personnel as described in Section 2.1.2 and 2.1.3
- Impermeable SCA with dike to hold volume of largest tank as described in Section 2.1.6
- Impervious containment under tanks or double bottoms in Section 2.1.6

Table 5-1 Response Planning Standard Calculations

Prevention Measures	Reductions	Applicable Response Planning Standard (bbl)
Volume of Largest Tank	--	12,328.5
Alcohol and Drug Testing of Key Personnel per 18 AAC 75.432(d)(1)	5% (-616.4 bbl)	11,712.1
Impermeable Secondary Containment per 18 AAC 75.432(d)(4)	60% (-7,027.3 bbl)	4,684.8
Impervious Containment Under Tanks per 18 AAC 75.432(d)(5)(C)	25% (-1,171.2 bbl)	3,513.6
TOTAL ADJUSTED RPS VOLUME		**3,514 bbl / 147,572 gallons**
TOTAL TO REACH OPEN WATER[1]		**238 bbl / 10,000 gallons**

[1]See Section 3.2 for a discussion of the potential amount of discharged oil that could reach open water.

APPENDICES

Appendix A Operational Forms

Form 1 - Initial Spill Report Form

Form 2 - Monthly Facility Inspection Form

Form 3 - Secondary Containment Weekly Inspection Form

Form 4 - Secondary Containment Drainage Log

Form 5 - Qualified Individual Quarterly Notification Drill Log

Form 6 - Response Equipment Deployment Exercise Log

Form 7 - Spill Management Team Tabletop Exercise Log

Form 8 - Spill Response Equipment Inspection Form

Note: The forms provided in this Appendix are for example purposes only. The exact format in which inspections, notifications, exercises, etc. are documented may vary from what is presented here; in addition, although the content will be the same, some of the wording may vary in presentation.

DELTAWESTERN™ PETROLEUM

INITIAL SPILL REPORT FORM

Person Reporting: _____ **Company:** _____

Facility: _____ **Incident Location:** _____

Date of Discharge	Time of Discharge	Product Released	Amount Released

Source of Discharge:	Surface Type:
☐Tank ☐Truck ☐Vessel ☐Pipeline ☐Other	☐Gravel ☐Asphalt ☐Water ☐Containment

Affected Area Size:	Estimated Amount of Recovered Product:	Estimated Amount and Type of Waste Generated:

Circumstances that Caused the Discharge (Please Give Details):	Description of Cleanup Actions Taken/Proposed:	Description of Actions Taken to Prevent Recurrence of Discharge:
☐Equipment Failure ☐Unknown/Observed ☐Human Error		

Was a QI Notified?	Date Reported:	Time Reported:
☐Yes ☐No		
If a QI was notified, which QI was it reported to?	**If a QI could not be reached, who made agency notifications?**	**Which agency was it reported to?**
		☐ADEC ☐NRC ☐LOCAL

Comments:

The initial notification to regulatory agencies must not be delayed pending collection of all information.

Upon completion submit to environmental@deltawestern.com

HAINES I/LUTAK MONTHLY FACILITY INSPECTION FORM

Facility: _____ **Date:** _____

This form is intended to document the completion of the monthly facility inspection required to document compliance with CPLAN & FRP requirements. This inspection must be performed once per month by a qualified member of the facility and documented on this form.

In the event a non-satisfactory condition is observed, a description and corrective action must be identified.

Inspection Item				If 'No' describe
Tank Farm	Satisfactory			
	Yes	No	N/A	
Fencing in place (upright without sagging)	☐	☐	☐	
Gates Locked	☐	☐	☐	
Emergency notification, no smoking, & restricted access signs posted near entrance	☐	☐	☐	
AEDC Spill poster posted	☐	☐	☐	
Perimeter lighting functioning	☐	☐	☐	
Stairways clear of obstruction and have handrails	☐	☐	☐	
Fire extinguishers mounted every 75 feet	☐	☐	☐	
Fire extinguisher monthly inspection complete	☐	☐	☐	
STI SP001 checklists for ASTs complete	☐	☐	☐	

Inspection Item				If 'No' describe
External Surface of Tanks	Satisfactory			
	Yes	No	N/A	
Tanks free of leaks, drip marks, or discoloration	☐	☐	☐	Fill out table numbers 3a-3j if 'No'
Tanks free of shell distortions, damage, or discoloration	☐	☐	☐	
No visible gaps between tank & foundation evident	☐	☐	☐	
Paint coating undamaged/not deteriorating	☐	☐	☐	
Tank foundations and attachments undamaged	☐	☐	☐	
Tank chimes clean & free of debris	☐	☐	☐	
Ground wires/straps in place/undamaged	☐	☐	☐	
Fixed scaffold support(s) free of corrosion and damage	☐	☐	☐	
Screen on rim vent covers satisfactory	☐	☐	☐	
All flanges, bolts, and valves tight	☐	☐	☐	
Valves operable	☐	☐	☐	
NFPA labels intact on all 4 sides	☐	☐	☐	

Inspection Item	Satisfactory			If 'No' describe
Piping & Piping Support	**Yes**	**No**	**N/A**	
Pipes not sagging from lack of adequate support	☐	☐	☐	
Pipes adequately supported near tank nozzle	☐	☐	☐	
Pipe support free of damage, properly aligned and not corroded	☐	☐	☐	
Support structure undamaged/uncorroded/level	☐	☐	☐	
Support legs in contact with pipe support	☐	☐	☐	
Support foundations level, brackets tight	☐	☐	☐	
Coating or paint in good condition	☐	☐	☐	
Pipe/insulation not in contact with the ground	☐	☐	☐	
All pipes painted	☐	☐	☐	
No leaks are present on any pipes	☐	☐	☐	Fill out "Causes table" below if 'No'

Causes of leaks or drips (TANKS & PIPELINES)	Satisfactory			If 'No' describe
MARK THROUGH IF YOU ANSWERED 'No' TO ABOVE TABLES	**Yes**	**No**	**N/A**	
Flange joint	☐	☐	☐	
Valve gland/body	☐	☐	☐	
Pump or packing seal	☐	☐	☐	
Flange bolts	☐	☐	☐	
Clamps	☐	☐	☐	
Pipe coating/paint	☐	☐	☐	
Ground contact of pipe	☐	☐	☐	
Signs of ground contamination/discoloration reported	☐	☐	☐	
All leaks fixed or reported for maintenance	☐	☐	☐	
Avgas dispenser interior	☐	☐	☐	

Inspection Item		Satisfactory			If 'No' describe
Storage Tank Overfill Protection System		**Yes**	**No**	**N/A**	
4a	Tank level gauges fully functional	☐	☐	☐	
4b	High level alarms operable	☐	☐	☐	

Inspection Item	Satisfactory			If 'No' describe
Vegetation Control	**Yes**	**No**	**N/A**	
Vegetation absent in dike area	☐	☐	☐	
Vegetation absent under/around pipe racks	☐	☐	☐	

Inspection Item	Satisfactory			If 'No' describe
Rainwater and Grading	Yes	No	N/A	
Dike liner undamaged/deteriorated	☐	☐	☐	
No excessive rainwater in dike area or around base of tanks	☐	☐	☐	
Dike drain valves operable	☐	☐	☐	
Dike drain valves closed	☐	☐	☐	

Inspection Item	Satisfactory			If 'No' describe
Hillside Piping	Yes	No	N/A	
Concrete support structures (3) checked for integrity	☐	☐	☐	
Pipe wrapping at edge of road in good condition	☐	☐	☐	
Visual inspection of pipe structures	☐	☐	☐	
Pipes in good condition, coated with no leaks, drips, damage	☐	☐	☐	

Inspection Item	Satisfactory			If 'No' describe
Truck Rack	Yes	No	N/A	
Warning signs, restricted access and no smoking signs posted	☐	☐	☐	
Transfer procedure sign posted (turn off engine, use wheel chocks, etc.)	☐	☐	☐	
Fire extinguisher(s) mounted every 75 feet	☐	☐	☐	
Fire extinguisher monthly inspection complete	☐	☐	☐	
No visual signs of damaged or missing ground wires/straps	☐	☐	☐	
SCA pad/berms free of damage/debris	☐	☐	☐	
No visual signs of paint coating damage or deterioration	☐	☐	☐	
Oil water filtration system functioning properly	☐	☐	☐	
Truck rack office fire cabinet secured and contents labeled.	☐	☐	☐	
Jet A filter vessels in good condition, no leaks, drips, cracks	☐	☐	☐	
Pipes, flanges, strainers, valves free of leaks, drips and cracks	☐	☐	☐	
Load rack pump greased (1X month)	☐	☐	☐	
Load rack hoses free of leaks, drips, cracks, and secured	☐	☐	☐	

Inspection Item				If 'No' describe
Marine Header/Dock	Satisfactory			
	Yes	No	N/A	
Warning signs, restricted access and no smoking signs posted	☐	☐	☐	
Dock lighting functioning	☐	☐	☐	
Catchment pans/basins emptied	☐	☐	☐	
Life rings with 90 feet of rope attached to dock	☐	☐	☐	
Fire extinguishers mounted every 75 feet	☐	☐	☐	
Hoses crack free, stenciled with current hydrostat date	☐	☐	☐	
Nozzle holder available for each hose	☐	☐	☐	
Dock free of trip hazards	☐	☐	☐	

Inspection Item				If 'No' describe
Miscellaneous Items	Satisfactory			
	Yes	No	N/A	
Absence of exposed electrical wiring/connections	☐	☐	☐	
Monthly response equipment checklist complete	☐	☐	☐	

Name: _____ **Title:** _____

Signature: _____ **Date Signed:** _____

The completed inspection from must be retained onsite or at a readily available alternative site (i.e., DW Facility). Scanned copies of the completed inspection form should be sent to environmental@deltawestern.com

DELTAWESTERN™ PETROLEUM

SECONDARY CONTAINMENT WEEKLY INSPECTION FORM

Facility: _____ **SCA Name:** _____

Month: _____ **Year:** _____

This form is designed to document compliance with 18 AAC 75.075(c) which states: A secondary containment system must be maintained free of debris, vegetation, excessive accumulated water, or other materials or conditions that might interfere with the effectiveness of the system. Facility personnel shall visually check for the presence of oil leaks or spills within secondary containment areas during routine operations, and, unless precluded by safety concerns or weather conditions, shall conduct documented weekly inspections of secondary containment areas, including checking for: (1) debris and vegetation, (2) proper alignment and operation of drain valves, (3) visible signs of oil leaks or spills; and (4) defects or failures of the secondary containment system. See CPLAN Section 2.1.6 for additional information.

Rate each item:

S – Satisfactory condition; working as designed

U – Unsatisfactory condition; needs corrective action

NA – Not Applicable (applies only to proper alignment and operation of drain valves)

	WEEK 1	WEEK 2	WEEK 3	WEEK 4	WEEK 5
Date					
Inspector Name					
Debris or Vegetation Present?	☐ S ☐ U	☐ S ☐ U	☐ S ☐ U	☐ S ☐ U	☐ S ☐ U
Proper Alignment and Operation of Drain Valves?	☐ S ☐ U ☐ NA	☐ S ☐ U ☐ NA	☐ S ☐ U ☐ NA	☐ S ☐ U ☐ NA	☐ S ☐ U ☐ NA
Visible Signs of Oil Leaks or Spills?	☐ S ☐ U	☐ S ☐ U	☐ S ☐ U	☐ S ☐ U	☐ S ☐ U
Defects or Failures of Containment System?	☐ S ☐ U	☐ S ☐ U	☐ S ☐ U	☐ S ☐ U	☐ S ☐ U
Corrective Actions (Taken or Needed and Date Closed)					

Submit a copy of this form at the beginning of each new month to environmental@deltawestern.com.

SECONDARY CONTAINMENT DRAINAGE LOG

Facility: ______________________ **SCA Name:** ______________________

This form is designed to document compliance with various response plan requirements, including CPLAN requirements (18 AAC 75.075(d)), FRP requirements, and SPCC requirements, as applicable.

This form should be completed each time prior to discharging water from a secondary containment area.

DATE	WATER PRESENT IN SCA?	IF WATER PRESENT, ESTIMATED VOLUME IN GALLONS	SHEEN ON WATER?	TREATMENT?	EMPLOYEE NAME
	☐ Yes ☐ No		☐ Yes ☐ No		
	☐ Yes ☐ No		☐ Yes ☐ No		
	☐ Yes ☐ No		☐ Yes ☐ No		
	☐ Yes ☐ No		☐ Yes ☐ No		
	☐ Yes ☐ No		☐ Yes ☐ No		
	☐ Yes ☐ No		☐ Yes ☐ No		
	☐ Yes ☐ No		☐ Yes ☐ No		
	☐ Yes ☐ No		☐ Yes ☐ No		
	☐ Yes ☐ No		☐ Yes ☐ No		
	☐ Yes ☐ No		☐ Yes ☐ No		
	☐ Yes ☐ No		☐ Yes ☐ No		
	☐ Yes ☐ No		☐ Yes ☐ No		
	☐ Yes ☐ No		☐ Yes ☐ No		
	☐ Yes ☐ No		☐ Yes ☐ No		
	☐ Yes ☐ No		☐ Yes ☐ No		

Submit a copy of this form at the beginning of each new month to environmental@deltawestern.com.

Qualified Individual Quarterly Notification Drill Log

Facility: ____

This form is intended to document completion of quarterly QI notification drills to demonstrate that the QI will respond as expected and carry out required duties in a spill response emergency or threat of a spill. To satisfy the drill requirements, contact must be made via telephone and confirmation received from the QI.

At least once per calendar year, the QI notification drill should be conducted during non-business hours.

The facility shall document completion of the quarterly QI notification drill on the table below. Multiple years can be documented on this page as appropriate.

QUARTER	DATE	TIME	PERSON MAKING CALL	NAME OF QI CONTACTED
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		
☐Q1 ☐Q2 ☐Q3 ☐Q4		☐AM ☐PM		

Upon completion of each QI notification drill, submit a copy of this form to environmental@deltawestern.com.

DELTAWESTERN™ PETROLEUM

RESPONSE EQUIPMENT DEPLOYMENT EXERCISE LOG

Date: _____ **Facility:** _____

Emergency Response Team: ☐SEAPRO ☐CISRPI ☐Chadux ☐Internal

Was this deployment an:		Was this deployment:	
☐Exercise	☐Actual Event	☐Announced	☐Unannounced

Time Started:	Time Emergency Response Team Called:	Time Emergency Response Team On-Scene:	Time Boom Deployed:	Time Skimmer/Pump On-Scene:	Time Completed

Date and Time of Discharge:	Source of Discharge:	Surface Type:	Affected Area Size:
	☐Tank ☐Truck ☐Vessel ☐Other	☐Gravel ☐Asphalt ☐Water	

Product Released:	Amount Released:	Estimated Amount of Recovered Product:	Estimated Amount and Type of Waste Generated:

Circumstances that Caused the Discharge (Please Give Details):	Description of Cleanup Actions Taken/Proposed:	Description of Actions Taken to Prevent Recurrence of Discharge:
☐Equipment Failure ☐Unknown/Observed ☐Human Error		

Comments:

Upon completion submit to environmental@deltawestern.com

DELTAWESTERN™ PETROLEUM

SPILL MANAGEMENT TEAM TABLETOP EXERCISE LOG

Date: _____ **Facility/Location of Tabletop:** _____

Time Started	Time Completed	Type of Scenario
		☐Exercise ☐Actual Event

Response Plan Scenario Used:			Size of Simulated Spill
☐AMPD	☐MMPD	☐WCD	

Please describe how the following objectives were exercised:

The spill management team's knowledge of the oil spill response plan:

Proper Notifications:

Communications System:

The spill management team's ability to access contracted oil spill removal organizations:

The spill management team's ability to coordinate with OSC, state, and applicable agencies:

The spill management team's ability to access ESA resource information in the Area Contingency Plan:

Which core components of the plan were exercised?				
☐Notifications	☐Staff Mobilization	☐Operate in Response Management System	☐Discharge Contained	☐
Assessment	☐Containment	☐Recovery ☐Protection	☐Disposal ☐Communications	☐
Transportation	☐Personnel Support	☐Equipment Maintenance and Support	☐Procurement ☐Documentation	

Lessons learned and person(s) responsible for any corrective actions:

Attendees Printed Name and Signature:

Upon completion submit to environmental@deltawestern.com.

DELTAWESTERN™ PETROLEUM

SPILL RESPONSE EQUIPMENT INSPECTION FORM

Semiannually: ☐ January-June / ☐ July-December **Year:** _____

Inspector (Print): _____ **Date & Time:** _____

Inspector (Sign): _____ **Site:** Haines I / Lutak

This form is intended to document the completion of the Delta Western-owned spill response equipment inspection for the Facility's Response Plans. This inspection must be performed semi-annually by qualified member of the facility. DW maintains or has access to local spill response equipment adequate to respond to an oil spill from the facility. The Facility Manager is responsible for equipment storage and maintenance.

Equipment		Quantity		Rating/Capacity Comments	Inspected/ Tested
		Required	On Hand		
Boom	Containment	**1,000 ft**			☐
	Tow Bridles	**2**			☐
	Anchor Buoy Systems	**6**			☐
	Lights	**4**			☐
	Repair Kit	**1**			☐
Sorbent	Pads (oil & general purpose)	**1,000**			☐
	Boom	**240 ft**			☐
	Sweep Boom	**200 ft**			☐
	Sweeps	**2**			☐
	Roll	**6**			☐
	Kit	**1**			☐
PPE	Rubber Boots	**6 pair**			☐
	Rubber Gloves	**12 pair**			☐
	Rain Gear	**6 pair**			☐
	Safety Goggles	**6**			☐
	PFD Vests	**6**			☐
	Hard Hats	**6**			☐
	Tyvek Suits	**6**			☐
Hoses	Suction	**4**			☐
	Discharge	**8**			☐
	Floats	**4**			☐
Skimmer	SkimPak 4200SH	**1**			☐
Pump	Skimmer, 2" gas Honda, 185 GPM	**1**			☐
Pipe Clamps	6 inch	**3**			☐
	4 inch	**2**			☐
Drums	Overpack	**10**			☐
	Salvage	**20**			☐
Hand Tools	Rakes	**3**			☐
	Shovels	**3**			
Trash Bags	Disposable	**1 box**			☐
Sheeting	Plastic Liner	**2**			☐
Boat	Response Skiff	**1**			☐

Delta Western spill response equipment is stored at the TTLR , warehouse, office, or boom truck.

COMMENTS (if none, record "none")

The completed inspection from must be retained onsite or at a readily available alternative site (i.e., DW Facility). Scanned copies of the completed inspection form should be sent to environmental@deltawestern.com.

Appendix B Response Forms

Form 1 - ADEC Oil and Hazardous Substances Spill Notification Form

Form 2 - ADEC Spill Placard

Graphic Response Strategies (GRS)

- Portage Cover SRS, SE08-05
- Chilkoot River, SE08-03

ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION

OIL & HAZARDOUS SUBSTANCES SPILL NOTIFICATION FORM

ADEC USE ONLY

ADEC SPILL #:	ADEC FILE #:	ADEC LC:

PERSON REPORTING:	PHONE NUMBER:	REPORTED HOW? (ADEC USE ONLY) ☐ Phone ☐ Fax ☐ PERS ☐ E-mail
DATE/TIME OF SPILL:	DATE/TIME DISCOVERED:	DATE/TIME REPORTED TO ADEC:

INCIDENT LOCATION/ADDRESS:	DATUM: ☐ NAD27 ☐ NAD83 ☐ WGS84 ☐ Other _____ LAT. LONG.	PRODUCT SPILLED:

QUANTITY SPILLED: ☐ gallons ☐ pounds	QUANTITY CONTAINED: ☐ gallons ☐ pounds	QUANTITY RECOVERED: ☐ gallons ☐ pounds	QUANTITY DISPOSED: ☐ gallons ☐ pounds

	POTENTIAL RESPONSIBLE PARTY:	OTHER PRP, IF ANY:	VESSEL NAME:
Name/Business:			
Mailing Address:			VESSEL NUMBER:
Contact Name:			> 400 GROSS TON VESSEL: ☐ Yes ☐ No
Contact Number:			

SOURCE OF SPILL:	CAUSE CLASSIFICATION:
CAUSE OF SPILL: ☐ Under Investigation	☐ Accident ☐ Human Factors ☐ Structural/Mechanical ☐ Other

CLEANUP ACTIONS:

DISPOSAL METHODS AND LOCATION:

AFFECTED AREA SIZE:	SURFACE TYPE: *(gravel, asphalt, name of river etc.)*	RESOURCES AFFECTED/THREATENED: *(Water sources, wildlife, wells, etc.)*

COMMENTS:

ADEC USE ONLY

SPILL NAME:	NAME OF DEC STAFF RESPONDING:	C-PLAN MGR NOTIFIED? ☐ Yes ☐ No

DEC RESPONSE: ☐ Phone follow-up ☐ Field visit ☐ Took Report	CASELOAD CODE: ☐ First and Final ☐ Open/No LC ☐ LC Assigned	CLEANUP CLOSURE ACTION: ☐ NFA ☐ Monitoring ☐ Transferred to CS or STP

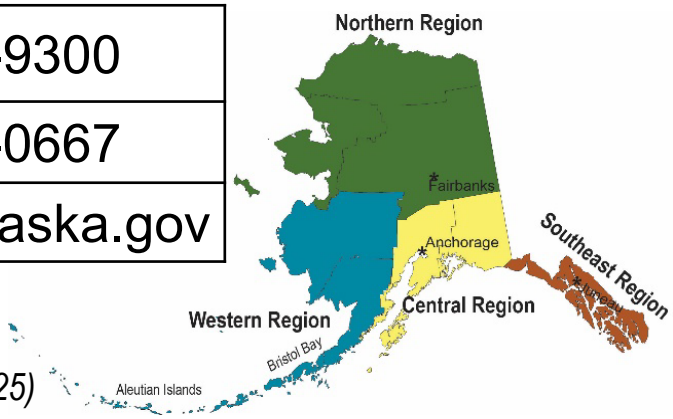
COMMENTS:

Status of Case: ☐ Open ☐ Closed DATE CASE CLOSED:

REPORT PREPARED BY:	DATE:

Report Oil and Hazardous Substance Spills

TOLL-FREE	1-800-478-9300
INTERNATIONAL	1-907-269-0667
ONLINE	ReportSpills.alaska.gov



It's Required by Alaska Law!
(AS 46.03.755, AS 46.03.450, 18 AAC 75.300, 18 AAC 75.325)

Oil and Petroleum Product Reporting

Spills to Water

- Any amount spilled to water must be reported **immediately.**

Spills to Land

- Spills in **excess of 55 gallons** must be reported **immediately**.
- Spills in **excess of 10 gallons but less than 55 gallons** must be reported within 48 hours.
- Facilities shall maintain a spill log and report a record of oil discharges from **1 to 10 gallons** monthly.

Spills to Impermeable Secondary Containment

- Spills in **excess of 55 gallons** must be reported within 48 hours.

Hazardous Substance Reporting

Any hazardous substance spill, other than oil, must be reported **immediately.**

Underground Storage Tank (UST)* Reporting

You must report a suspected below ground release from a UST system, in any amount, within 24 hours. (18 AAC 78.212)

If a release is suspected the owner or operator of a UST shall investigate the UST site and shall report to the UST Unit within the period specified. (18 AAC 78.200)

Alaska Department of Environmental Conservation
Division of Spill Prevention and Response
https://spills.alaska.gov

Contact us: (907) 465-5250

* Regulated UST as defined in AS 46.03.450(8)

Revised 10/10/2022

Portage Cove SRS, SE08-05

Geographic Response Strategies for Southeast Alaska Subarea, Zone 8

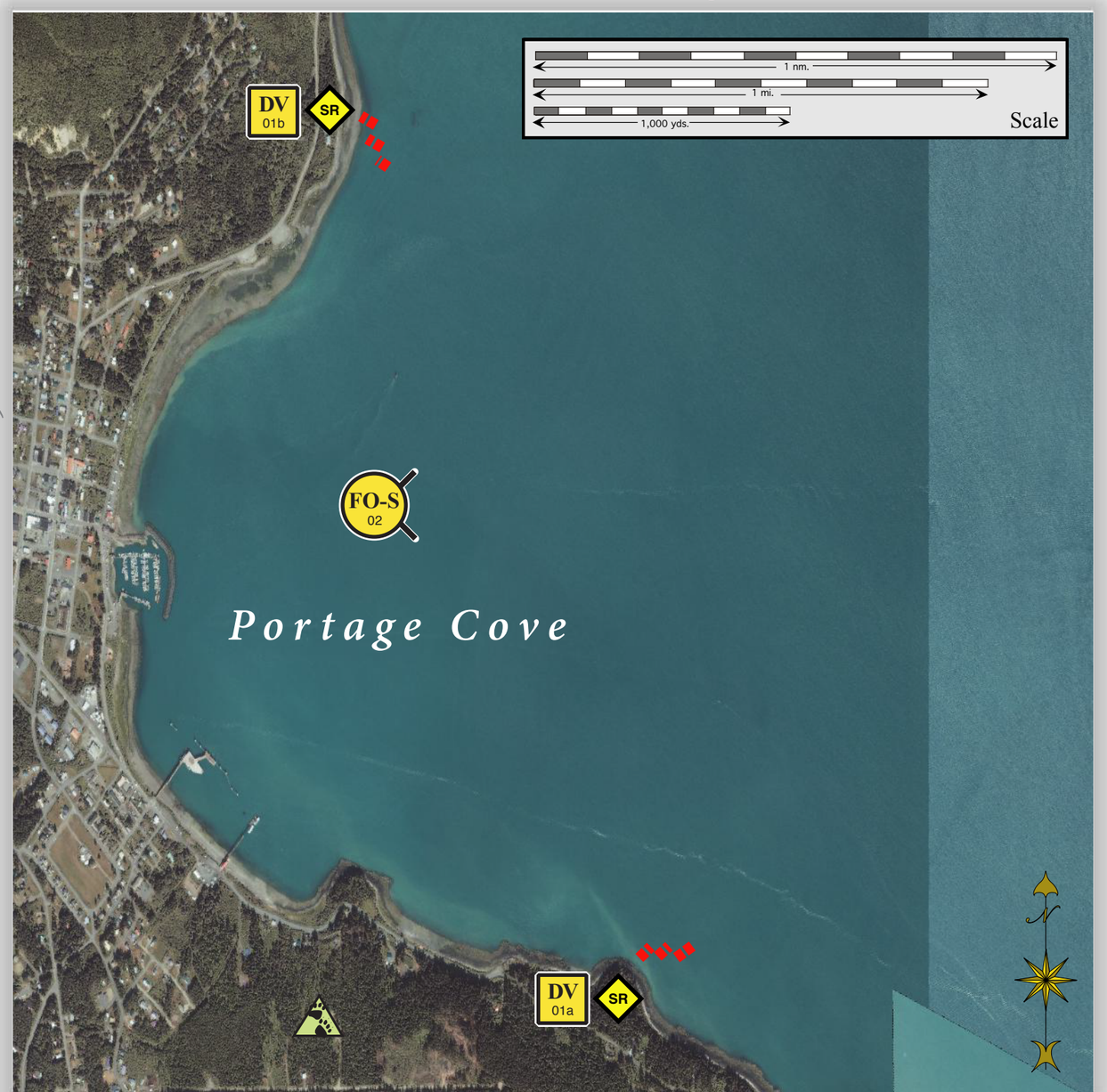
DV01b viewed from the east.

DV01a viewed from the east.

Map Legend

- FO-S — Free-oil Recovery
- DV — Diversion Booming
- SR — Shoreside Recovery
- Protected-water Boom

Center of map at 59° 14.01' N Lat., 135° 25.49' W Lon.



This is not intended for navigational use.

May 2014

DRAFT This tactic map is a working draft being used to develop a Geographic Response Strategy at this location. The tactics represented here have not been approved by the Subarea Committee and should not be considered final. If you have questions or comments please contact us by email at contact@nukaresearch.com.

NUKA Research & Planning Group, LLC.

ID	Location and Description	Response Strategy	Implementation	Response Resources	Staging Area	Site Access	Resources Protected	Special Considerations
SE08-05-01 DV	**Portage Cove** a. Lat. 59° 13.27'N Lon. 135°24.29'W b. Lat. 59° 14.40'N Lon. 135°25.33'W	**Divert and Collect** Divert oil to shore-side collection points determined by spill source and trajectory. If oil is moving along the coastline deployment may be effective.	Deploy anchors and boom with skiffs (class 6). Exact collection site should be determined by spill trajectory. At each location cascade 3 x 200 ft. section protected-water boom at proper angle to divert incoming oil to the collection site. Set-up collection site using shore-side collection units or if oil volume is minimal, use sorbent boom or snare line to provide collection of oil. Tend throughout the tide.	**Deployment** **Equipment** 1200 ft. protected-water boom 12 ea. anchor systems 4 ea. anchor stakes 2 ea. shore-side collection units **Vessels** 3 ea. class 6 **Personnel/Shift** 6 ea. vessel crew 3 ea. response techs **Tending** **Vessels** 1 ea. class 6 **Personnel/Shift** 3 ea. vessel crew 3 ea. response tech	Haines	Via marine waters Chart 17317	Fish- coho, cutthroat, dolly varden Habitat- exposed rocky shores, sandy beach Human Use – high recreational use, commercial fishing	Vessel master should have local knowledge. Consult the Site Selection Matrix for cultural resources designation. Consult the ADEC "Spill Tactics for Alaska Responders" manual for additional information on the deployment of these tactics. Site: not surveyed Tested: not yet
SE08-05-02 FO-S	**Portage Cove** Nearshore waters in the general area of: Lat. 59° 14.12'N Lon. 135°25.55'W	**Free-oil Recovery** Maximize free-oil recovery in the offshore & nearshore environment of Portage Cove depending on spill location and trajectory.	Deploy free-oil recovery strike teams upwind and up current of Portage Cove. Use aerial surveillance to locate incoming slicks.	Deploy multiple free-oil recovery strike teams as required to maximize interception of oil before it impacts sensitive areas.	Haines	Via marine waters Chart 17317	Same as SE08-05-01	Vessel master should have local knowledge. Use extreme caution, shoal waters with numerous reefs and rocks, shallow mud flats and channels.

NOTE: Sensitive resource information can be found on other maps which can be accessed through the sensitive area section of the SE AK Sub-Area Contingency Plan: http://www.dec.state.ak.us/spar/perp/plans/scp_se.htm.

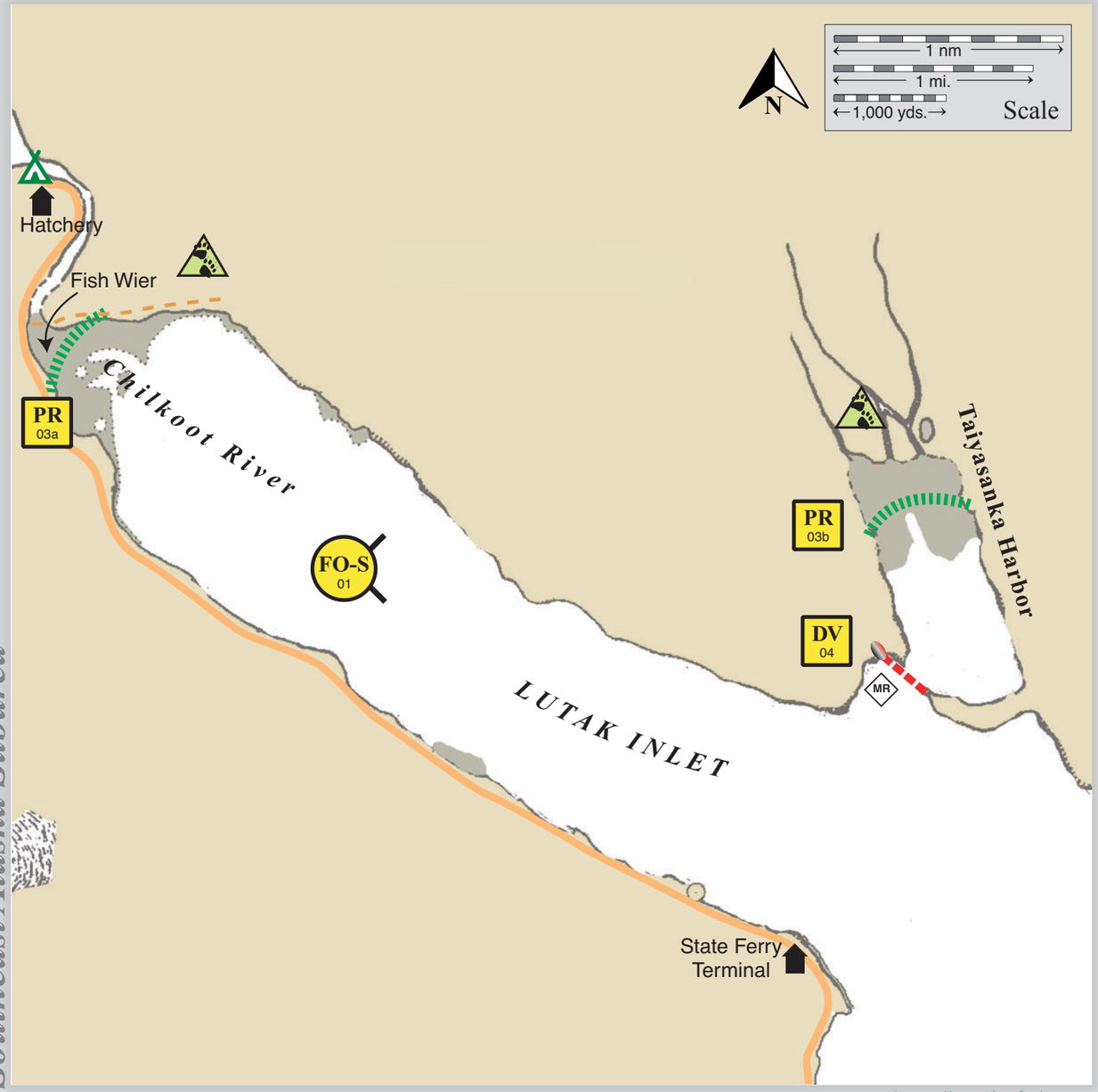
Chilkoot River, SE08-03

Center of map at 59° 17.8' N Lat., 135° 28.6' W Lon.

Legend & Map Photo

SE08-03-03a Chilkoot River looking towards the northwest.

- FO-S — Free-oil Containment and Recovery, Shallow Water
- PR — Passive Recovery and Debris Removal
- DV — Diversion Booming
- Protected-water Boom
- Tidal-seal Boom
- Snare Line
- MR — Marine Recovery
- Bears in Area, Guards Needed
- Road
- ATV Trail
- Campground



Soundings in fathoms

This is not intended for navigational use.

Geographic Response Strategies for Southeast Alaska Subarea

June 26, 2003

Tim L. Robertson

ID	Location and Description	Response Strategy	Implementation	Response Resources	Staging Area	Site Access	Resources Protected (months)	Special Considerations
SE08-03-01	**Lutak Inlet** Nearshore waters in the general area of: Lat. 59º 17.8 N Lon. 135º 28.6 W	**Free-oil Recovery-Shallow Water** Maximize free-oil recovery in the offshore & nearshore environment of Chilkoot River depending on spill source and trajectory.	Deploy free-oil recovery strike teams upwind and up-current of Chilkoot River. Use aerial surveillance to locate incoming slicks.	Multiple free-oil recovery strike teams as required to maximize interception of oil before it impacts sensitive areas.	Haines Ferry Terminal	Via marine waters Chart 17317	Same as SE08-03-02	Vessel master should have local knowledge. Tested: not yet
SE08-03-02	**Chilkoot River** a. Chilkoot River Lat. 59º 19.27 N Lon. 135º 33.32 W b. Taiyasanka Harbor Lat. 59º 18.64 N Lon. 135º 25.94 W	**Passive Recovery** Minimize impact to the tidal flats through use of passive recovery of oil.	Place snare line or sorbent boom, depending on oil types, across the entrance to the tidal flats at both locations. Anchor with stakes. Replace as necessary to maximize recovery of oil. Boom Lengths a. 2000 ft. b. 2400 ft.	**Deployment Equipment** 4400 ft of snare line or sorbent boom. 50 anchor stakes. **Vessels, Tending, Personnel** Same as SE08-03-02	Vessel platform Campground on river	Via marine waters Chart 17317	Fish-eulachon spawning, salmon/trout spawning (coho, pink, chum, sockeye, Dolly Varden, cutthroat) Birds-waterfowl concentration, particularly along lower southern shore of Lutak Inlet (year-round) Human use-subsistence (fish and intertidal invertebrates), commercial fishing (salmon), high recreational use Terrestrial mammals-bears	Use snare line for persistent oils and sorbent boom for non-persistent oils. FOSC Historic Properties Specialist should MONITOR on-site operations. Title 41 permit may be necessary. Contact ADNR. See Figure G-3-16 for equipment locations. Fish weirs may be present. Bears in area. Tested: not yet
SE08-03-03	**Taiyasanka Harbor** Lat. 59 º 17.86 N Lon. 135º 25.81 W	**Divert and Recover** Divert oil to shoreside recovery points determined by spill source and course.	Deploy anchors and boom with fishing vessels and skiffs (class 3/4/6). Place protected-water boom across the entrance to the harbor at the proper angle to divert oil to recovery site. Set-up recovery unit and tend throughout the tide.	**Deployment Equipment** 600 ft. protected-water boom 1 ea. ≥50 ft. section tidal-seal boom 6 ea. anchor systems (~30 lbs.) 6 ea. anchor stakes 1 ea. shoreside or marine recovery unit **Vessels/ Personnel** Same as SE08-03-02 **Tending Vessel** Same as SE08-03-02 **Personnel / Shift** 2 ea. Response techs.	Vessel platform	Via marine waters Chart 17317	Same as SE08-03-02	Take appropriate measures as outlined in Part 2 of this document to protect the beach at the recovery site. Tested: not yet