



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

**Department of
Environmental Conservation**
DIVISION OF SPILL PREVENTION AND RESPONSE
Prevention, Preparedness, and Response Program

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November 17, 2017

Tom Stokes
Alyeska Pipeline Service Company
PO Box 196660, MS 502
Anchorage, AK 99519-6660

Subject: Alyeska Pipeline Service Company Oil Discharge Prevention and Contingency Plan, ADEC Plan #: 14-CP-4057; Amendment 2017-2 Request for Additional Information.

Dear Mr. Stokes:

The Alaska Department of Environmental Conservation (department) has reviewed the application package for the Amendment 2017-2 to the Alyeska Pipeline Service Company Oil Discharge Prevention and Contingency Plan (plan) received on May 31, 2017. The department has determined that additional information is still needed before the application package can be determined complete. The enclosed table outlines these issues.

Any changes made to the plan must be clearly identified. Please also provide a summary of the changes made to the plan with explanations and supplementary information for the changes where necessary. This information can be added to the enclosed table. In order to continue a timely review by the department, the additional information should be submitted by January 16, 2018.

If you have any questions, please contact me at 907-835-1470 or Pete.LaPella@alaska.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Pete LaPella".

Pete LaPella
Environmental Program Specialist

Enclosures: Table 1.0: Request for Additional Information

cc with enclosure: Scott Hicks, APSC
 Lori Burroughs, APSC
 Martin Parsons, APSC
 Sue Wood, APSC

Amanda Hatton, APSC
Sarah Moore, ADEC
Geoff Merrell, ADEC
Ron Doyel, ADEC
Pete LaPella, ADEC
Anna Carey, ADEC
Dan Allard, ADEC
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Lee McKinley, ADF&G
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David Lehman, USDOT PHMSA
CDR Michael Franklin, USCG
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Donna Schantz, PWS RCAC
Linda Swiss, PWS RCAC
Chuck Totemoff, Village of Chenega
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Kimber Moonin, Village of Tatitlek
Mark Lynch, City of Whittier
Rochelle Rollenhagen, City of Valdez
Tracy Raynor, Valdez Fire Department
Randy Robertson, City of Cordova
Tom Lakosh

Table 1.0: Request for Additional Information on Amendment 2017-2 to VMT ODPCP (14-CP-4057)

#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
1	All	All	18 AAC 75.415	Incorporate the approved changes from Amendment 2017-1, 2017-3, and 2017-4 to future submittals. Ensure that the references to the marine service provider company are appropriate.	
2	1.2-4	Vol. 1	18 AAC 75.425(e)(1)(B)	Ensure the QI is up-to-date as listed in Table 1.2-2.	
3	2.1-42	Vol. 1, Section 2.1.17	18 AAC 75.425(e)(2)(A), 18 AAC 75.445	Do the tugs have the capability to undock the largest tanker that is without power at variable sea states within an hour?	
4	2.4-3	Vol. 1, Section 2.4.5, Vol. 2	18 AAC 75.425(e)(2)(D), 18 AAC 75.425(e)(1)(F), 18 AAC 75.445	What are the predicted trajectories and towline forces in the Seakeeping Analysis Reports for the ASD 4517 and ASD 3212 used for docking, undocking and barge towing?	
5	2.4-3	Vol. 1, Section 2.4.5, Vol. 2	18 AAC 75.425(e)(2)(D), 18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Provide a signed copy of the ASD 4517 Seakeeping Analysis including information that states who did the report, who checked the report, and who approved the report.	
6	2.4-3	Vol. 1, Section 2.4.5, Vol. 2	18 AAC 75.425(e)(2)(D), 18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Explain why propeller emergence was not analyzed for ASD 4517 when it was done for the ASD 3212.	
7	2.4-3	Vol. 1, Section 2.4.5, Vol. 2	18 AAC 75.425(e)(2)(D), 18 AAC 75.425(e)(1)(F), 18 AAC 75.445	The Seakeeping Analysis Report for the ASD 4517 was run at 50% consumables, but should be run at 98% consumables also. For the ASD 3212, the analysis was run at both 50% and 98% consumables.	
8	2.4-3	Vol. 1, Section 2.4.5, Vol. 2	18 AAC 75.425(e)(2)(D), 18 AAC	In reference to the ASD 3212 and ASD 4517 TUGSIM calculation reports, what measures will be put in place to avoid stalling of the engines in other than transverse mode? If this is not	

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#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
9	2.4-3	Vol. 1, Section 2.4.5	75.425(e)(1)(F), 18 AAC 75.445	applicable to towing barges and/or docking/undocking, please provide the supporting documentation for these operations.	
10	2.4-3	Vol. 1, Section 2.4.5	18 AAC 75.425(e)(2)(D), 18 AAC 75.445	What maneuvers are used for docking and undocking? Include more information including tethering procedures to ensure safe docking.	
11	2.4-3	Vol. 1, Section 2.4.5	18 AAC 75.425(e)(2)(D), 18 AAC 75.445	What tugs will be used for docking and undocking? Include information in Section 2.4.5 on which tugs will be used for docking and undocking.	
12	2.4-3	Vol. 1, Section 2.4.5, Vol. 2	18 AAC 75.425(e)(2)(D), 18 AAC 75.445	How can we ensure that the tugs can perform the maneuvers for docking and undocking?	
13	2.4-3	Vol. 1, Section 2.4.5, Vol. 2	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	What procedures are in place to ensure vessels will not stall while towing a barge, or for docking/undocking tankers?	
14	2.4-3	Vol. 1, Section 2.4.5, Vol. 2	18 AAC 75.425(e)(2)(D), 18 AAC 75.445	What is the maximum bollard pull the tugs are expected to produce? Provide documentation to support this information.	
15	2.4-3	Vol. 1, Section 2.4.5, Vol. 2	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	When tethered, what is the maximum pulling force that can occur in the towline? Provide documentation to support this information.	
				When untethered, what is the maximum pushing force that can occur in the fenders? Provide documentation to support this information.	

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#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
16	2.4-3	Vol. 1, Section 2.4.5, Vol. 2	18 AAC 75.425(e)(2)(D), 18 AAC 75.425(e)(1)(F), 18 AAC 75.445	What force can the tugs provide to hold the tankers against the dock in the given environmental conditions? Provide documentation to support this information.	
17	2.4-3	Vol. 1, Section 2.4.5, Vol. 2	18 AAC 75.425(e)(2)(D), 18 AAC 75.425(e)(1)(F), 18 AAC 75.445	What force can the tugs provide to pull the tankers away from the dock in the given environmental conditions? Provide documentation to support this information.	
18	2.4-3	Vol. 1, Section 2.4.5, Vol. 2	18 AAC 75.425(e)(2)(D), 18 AAC 75.425(e)(1)(F), 18 AAC 75.445	If the planned acceptance test for ASD 4517 and ASD 3212 (referenced in the Vessel Performance Report Rev. 4 on pg. 8 and 11) will be done in calm to moderate conditions (again, from the stern only), then it must be explained how the results of this test can be extrapolated to verify performance in more severe conditions, or when there is a transverse component from the winds or wave.	
19	2.4-3	Vol. 1, Section 2.4.5, Vol. 2	18 AAC 75.425(e)(2)(D), 18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Provide the performance requirements for ASD 4517 and ASD 3212 given to ECO and Damen's design teams referenced in the Vessel Performance Report Rev. 4 on pg. 1.	
20	2.4-3	Vol. 1, Section 2.4.7, Vol. 2, Vol. 3	18 AAC 75.425(e)(2)(D), 18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Information relating to ASD 4517 and ASD 3212 tug capability to perform in various weather scenarios is necessary to support the tugs ability to assist in a response in less than calm conditions. Provide the results for any tank-test modeling for the tugs to demonstrate this capability.	
21	2.4-3, 3.9-1	Vol. 1, Section 2.4.5,	18 AAC 75.425(e)(2)(D), 18 AAC	Include information on the vessel Master/Mate qualifications for ASD 4517s and ASD 3212s.	

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#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
22	2.4-3	Section 3.9 Vol. 1, Section 2.4.5	75.425(e)(1)(F), 18 AAC 75.445(j) 18 AAC 75.425(e)(2)(D), 18 AAC 75.445	Provide documentation of demonstrations of docking/undocking of tankers at berth for the ASD 4517 and ASD 3212. Explain why 40 knot winds as cited for closure conditions in Port Valdez were not used in the Seakeeping Analysis Reports for ASD 4517 and ASD 3212.	
23	2.4-3	Vol. 1, Section 2.4.7	18 AAC 75.425(e)(2)(D), 18 AAC 75.425(e)(1)(F), 18 AAC 75.445	In reference to the ASD 4517 TUGSIM calculation report loading condition, were these calculations made with or without Firefighting foam or dispersant aboard the vessel? If without, provide justification for why the calculations were performed without firefighting foam and dispersant aboard the vessel.	
24	3.1-12	Vol. 1, Section 3.1.5, Vol. 2	18 AAC 75.425(e)(2)(D), 18 AAC 75.425(e)(1)(F), 18 AAC 75.445	In reference to the ASD 3212 TUGSIM calculation reports loading condition, provide justification for why the calculations were performed without firefighting foam aboard the vessel.	
25	3.1-12	Vol. 1, Section 3.1.5	18 AAC 75.425(e)(2)(D), 18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Provide documentation that the ASD 4517 and ASD 3212 are designed to ABS Class 1 Firefighting.	
26	3.1-12	Vol. 1, Section 3.1.5	18 AAC 75.425(e)(2)(D), 18 AAC 75.445	Provide documentation that the ASD 4517 and ASD 3212 have the following: -Total pump capacity 10,580 gpm -Onboard foam capacity -Two high-capacity water monitors -Each monitor has a minimum range of 394 feet and a vertical range of 148 feet -Fuel capacity for 24 of sustained operations.	
27	3.1-12	Vol. 1, Section 3.1.5	18 AAC 75.425(e)(3)(A), 18 AAC 75.445		

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28	3.8-1	Vol. 1, Section 3.8	18 AAC 75.425(e)(3)(H)	It is stated that "Statements of contractual terms for certain contractors are also provided for Tatitlek Chenga Corporation (TCC) and Alaska Ventures (LLC (ECO) and Houston Construction in Volume 3, Section 12.11." In Volume 3, Section 11 it is shown that the Crowley contract has been removed but has not been updated with an ECO contract. Include the ECO statement of contractual terms.	
29	3.9-1	Vol. 1, Section 3.9.0	18 AAC 75.425(e)(3)(I), 18 AAC 75.445	Please clarify in the plan how oil spill response training will be managed.	
30	3.9-1	Vol. 1, Section 3.9.1	18 AAC 75.425(e)(3)(I), 18 AAC 75.445	Specify in the plan the learning management system referenced.	
31	3.9-1 through 3.9-3	Vol. 1, Section 3.9.1	18 AAC 75.425(e)(3)(I), 18 AAC 75.445	Specify in the plan how APSC will track oil spill response training for the different contractors that will be responsible for oil spill response operations in relation to the VMT plan.	
32	3.9-2	Vol.1 Section 3.9.1	18 AAC 75.425(e)(3)(I), 18 AAC 75.445	Who is the Program Coordinator and how does this person differ from the Program Manager, Preparedness Coordinator.	
33	3.9-2	Vol.1 Section 3.9.1	18 AAC 75.425(e)(3)(I), 18 AAC 75.445	Please provide what document is taking the place of learning plans.	
34	3.9-2	Vol.1 Section 3.9.1	18 AAC 75.425(e)(3)(I), 18 AAC 75.445	Explain the removal of the explanation of job roles and how APSC uses them including in the Oil Spill Response Job Roles list. How will this information be tracked, this needs to be added in the plan.	
35	3.9-3	Vol. 1, Section 3.9.1	18 AAC 75.425(e)(3)(I), 18 AAC 75.445	How objectives are accomplished in On the Job training needs to remain in the plan.	

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36	3.9-8	Vol.1, Section 3.9	18 AAC 75.445 18 AAC 75.425(e)(3)(I), 18 AAC 75.445	Table 3.9-4 states that Alaska Ventures, LLC (ECO)/TCC Open Water Task Force Leaders receive only HAZWOPER training and Basic Marine Safety with one deployment every 5 years. Open Water Task Force Leaders will be on OSRBs as designated oil spill response personnel that need to be trained and kept current in the specifics of plan implementation, including deployment of containment boom, operation of skimmers, etc. Evaluate training needs and update Table 3.9-4 to include appropriate trainings for Open Water Task Force Leaders such as trainings applicable to the OSRBs.	
37	3.9-7	Vol.1, Section 3.9	18 AAC 75.425(e)(3)(I), 18 AAC 75.445	Demonstrated performance for Alaska Ventures, LLC (ECO)/TCC Crucial Skimmer Skilled Responders, Alaska Ventures, LLC (ECO)/TCC Open Water Task Force Leaders is stated to occur once every 5 years but the Training Matrix shows responders will go through a demonstrated performance within 180 days upon arrival to duty in PWS. Update the table to include initial demonstration date upon arrival requirements.	
38	3.9-7, 3.9-8	Vol.1, Section 3.9	18 AAC 75.425(e)(3)(I), 18 AAC 75.445	When new response personnel for the OSRBs come into the system and before new personnel are able to complete a deployment it is important to ensure response readiness of the barge crews. How will APSC ensure response readiness of the barge crews for the OSRBs with new personnel?	
39	3.9-7, 3.9-8	Vol.1, Section 3.9	18 AAC 75.425(e)(3)(I), 18 AAC 75.445	Include specific roles for the barge crews. For example, include the specific duties for the roles of an OSRB barge Mate, Tankerman/PIC, Deck/Eng, and A.B. that are manning the barge. Include how barge crewing fills responder roles	

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40	3.9-7, 3.9-8	Vol. 1, Section 3.9	18 AAC 75.425(e)(3)(I), 18 AAC 75.445	such as Basic Responder, Tankerman, Technician/Skilled Responder etc. Include specific trainings for tug crews and their associated response job roles. For example: include the specific trainings for tug crews, such as towing a OSRB barge in Open Water Task Force formations, lightering, nearshore operations, Task Force Leader, etc. Specify for ASD 4517, ASD 3212, or Valdez Star. Include how tug crewing fills responder roles such as Basic Responder, Tankerman, Vessel Operator, etc.	
41	3.9-7, 3.9-8	Vol. 1, Section 3.9	18 AAC 75.425(e)(3)(I), 18 AAC 75.445	Ensure that vessel Masters/crews are trained to operate the FLIR and X-Band Radar for oil detection purposes. Include information that describes this in the plan.	
42	3.9-7, 3.9-8	Vol. 1, Section 3.9	18 AAC 75.425(e)(3)(I), 18 AAC 75.445	Document in the plan how responder training incorporates the specified tactics in Volume 3.	
43	3.9-17	Vol. 1, Section 3.9	18 AAC 75.425(e)(3)(I), 18 AAC 75.445	Update the training for Work Vessels to incorporate the responsibilities for the Line Boats.	
44	Section 3.9	Vol. 1, Section 3.9	18 AAC 75.425(e)(3)(I), 18 AAC 75.445	Propose updates to the version of Table 3.9-4 approved in Amendment 2017-1 as needed to ensure that all job roles/positions and training requirements are identified for the change in contractor.	
45	3.11-9 and 3.11-11	Vol. 1, Section 3.11	18 AAC 75.425(e)(3)(K)	In Table 3.11-5 and 3.11-6 ensure the correct volume is included for the Mineral Creek.	

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#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
46	4.4-5	Vol. 1, Section 4.4	18 AAC 75.425(e)(1)(F)(iv)	The reference "All tugs in Volume 3, Table 12-14, utilize FLIR or Radar." Was the intent to reference Table 12.5-2? Table 12-14 has been referenced several times, please update, if necessary, with the appropriate table number.	
47	4.4-2	Vol. 1, Section 4.4.2.2	18 AAC 75.425(e)(1)(F)(iv), 18 AAC 75.445	Does FLIR or Radar have ice detection capability or is this technology only suitable for tracking spilled oil? Update the plan to address this.	
48	4.4-2	Vol. 1, Section 4.4.2.2	18 AAC 75.425(e)(1)(F)(iv), 18 AAC 75.445	Include more information on the ability of the Vessel-mounted FLIR technology. For example, what type of FLIR systems, minimum standards for systems in use, capabilities and limitations?	
49	4.4-2	Vol. 1, Section 4.4.2.2	18 AAC 75.425(e)(1)(F)(iv), 18 AAC 75.445	Include more information on Radar technologies that will be used. What type of radar and in what configuration is being used now so that it is effective for oil detection and ice detection? What limitations and capabilities are available from the Radar APSC is using?	
50	4.4-5	Vol. 1, Section 4.4	18 AAC 75.425(e)(1)(F)(iv), 18 AAC 75.445	FLIR is referenced as a system and Radar as an alternate system, but they are both listed under the FLIR current method column and in the Radar column which is confusing. Please clarify the differences between the two systems, and if Radar means X-band Radar in both columns.	
51	4.4-5	Vol. 1, Section 4.4	18 AAC 75.425(e)(1)(F)(iv), 18 AAC 75.445	Does this FLIR and Radar work better in combination for detecting oil thickness? Please include the ability to use them in conjunction with each other.	
52	A.5-2	Vol. 1, Section A.5	18 AAC 75.425, 18 AAC 75.445	Include local contact information for Alaska Ventures, LLC in addition, when available.	

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#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
53	4.3-20	Vol. 2, Section 4	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	In the statement "Open Water Task Forces 1 and 2 (second task force could be TF2, 3, or 4 depending on which barges are in port at the time)," consider rewording to clarify Open Water Task Forces will be determined based on which OSRBs are in port at the time, so it is clear Open Water Task Force 1 may not always be called out. Footnote 1 states "Could be OWTF 1, 2, 3, or 4" should be for OWTF 1 and OWTF 2 instead of the entire column labelled Taskforce. Update for accuracy the referenced footnote.	
54	4.3-21	Vol. 2, Table 4.3-4	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Footnote 5 has the word "It" at the end of the sentence.	
55	4.3-21	Vol. 2, Table 4.3-4	18 AAC 75.425(e)(1)(F)	Footnote 3 is not referenced for OWTF 2, but should be. Update for accuracy.	
56	4.3-21	Vol. 2, Table 4.3-4	18 AAC 75.425(e)(1)(F)	The Name Plate for the Crucial 100 disc does not correspond to the information in the September 4, 2015 ADEC Decision on VMT Request for Assessment of Skimmer Efficiency letter. Please update with the approved oil recovery rate (ORR) information in this letter.	
57	4.3-21	Vol. 2, Table 4.3-4	18 AAC 75.425(e)(1)(F)	Please explain the change in the storage capacity of the Allison Creek, and ensure consistency with other areas in the plan.	
58	4.3-23	Vol. 2, Table 4.3-5 and 5.3-5	18 AAC 75.425(e)(1)(F)	Provide justification and ensure that the storage capacity for the OSRB is accurate for barges when they are constructed.	
59	4.4-2 and 5.3-16	Vol. 2 Table 4.3-5 and 5.3-5	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	OSRBs are sometimes called Open Water Barges in Volume 3 but are called Open Water Barges in Volume 1, or Open Water Barges, oil storage	
60	4.4-2 And 5.3-16	Vol. 2	18 AAC 75.425(e)(1)(F)		

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		Table 4.3-5 and 5.3-5		barges and OSB in Volume 2. Volume 3, Appendix A, provides a description of the OSRBs. Change Open Water Barge to correspond with equipment described in Volume 3, for example Volume 3, Appendix A, Figure A.1-7: OSRB.	
61	4.4-2-4.4-10 and 5.4-2-5.4-7	Vol. 2, Figure 4.4-1 and 5.4-1	18 AAC 75.425(e)(1)(F)	Provide justification on the Mobilization time of OWTF 1. Provide field testing results.	
62	4.4-2-4.4-10 and 5.4-2-5.4-7	Vol. 2, Figure 4.4-1 and 5.4-1	18 AAC 75.425(e)(1)(F)	Provide justification on the Transit time of OWTF 1. Provide field testing results.	
63	4.4-2-4.4-10 and 5.4-2-5.4-7	Vol. 2, Figure 4.4-1 and 5.4-1	18 AAC 75.425(e)(1)(F)	Provide justification on the Deployment time of OWTF 1. Provide field testing results.	
64	4.4-2-4.4-10 and 5.4-2-5.4-7	Vol. 2, Figure 4.4-1 and 5.4-1	18 AAC 75.425(e)(1)(F)	Provide justification on the Mobilization time of OWTF 2. Provide field testing results.	
65	4.4-2-4.4-10 and 5.4-2-5.4-7	Vol. 2, Figure 4.4-1 and 5.4-1	18 AAC 75.425(e)(1)(F)	Provide justification on the Transit time of OWTF 2. Provide field testing results.	
66	4.4-2-4.4-10 and 5.4-2-5.4-7	Vol. 2, Figure 4.4-1 and 5.4-1	18 AAC 75.425(e)(1)(F)	Provide justification on the Deployment time of OWTF 2. Provide field testing results.	
67	4.4-2 And 5.4-2	Vol. 2, Figure 4.4-1 and	18 AAC 75.425(e)(1)(F)	Explain why the No. column is being deleted and how the information from the No. column is being retained in the plan.	

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68	4.4-2	Figure 5.4-1 Vol. 2, Figure 4.4-1	18 AAC 75.425(e)(1)(F)	Ensure that the changes to the Figure required in Amendment 2017-1 after the final round of RFAs regarding showing TFs as on scene even if they are not skimming the whole time are incorporated.	
69	4.4-4	Vol 2, Section 4.4	18 AAC 75.425(e)(1)(F)	On pg. 4.1-20 it states, "Order tugs to pick up two Open Water barges for formation of Open Water Task Forces 1 and 2 (second task force could be TF2, 3, or 4 depending on which barges are in port at the time)". Explain why in the mobilization chart it takes 11 hours to transit to the location to begin deployment.	
70	4.4-4	Vol 2, Section 4.4	18 AAC 75.425(e)(1)(F)	Explain why the Open Water Barge does not have a tug listed as a component when equipment is being deployed from the tug in OWTF 2 on pg. 4.1-20.	
71	4.5-3 - 4.5-13 And 5.5-6 - 5.5-13	Vol. 2, Figure 4.5-1 and Figure 5.5-1	18 AAC 75.425(e)(1)(F)	Ensure the number of Line boats is captured as support vessels in the updated scenario. If the Line boat requirements are being fulfilled by a support vessel an additional support vessel should be added.	
72	4.5-5	Vol. 2, Figure 4.5-1	18 AAC 75.425(e)(1)(F)	The number of Vessel Basic Responders for the Valdez Star and barge Allison Creek (VMT-OW-2) does not correspond to the tactic in Volume 3. Update for consistency.	
73	5.1-15	Vol. 2 Table 5.1-3	18 AAC 75.425(e)(1)(F)	What barges will be "utilized" – is it the barges in Port Valdez? Or the closest barges?	
74	5.1-15	Vol. 2 Table 5.1-3	18 AAC 75.425(e)(1)(F)	Retain the level of specificity by identifying the Marine Contractor that personnel will need to be mobilized from.	

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75	5.1-17	Vol. 2 Table 5.1-3	18 AAC 75.425(e)(1)(F)	The VMT-WM-2 tactic only references Open Water recovery barges. Ensure that the Mineral Creek as a lightering barge is included in this tactic or reference the appropriate tactic.	
76	5.1-17	Vol. 2 Table 5.1-3	18 AAC 75.425(e)(1)(F)	Provide justification that the Mineral Creek and the crew aboard are able to make the connection at Berth 3 to receive recovered product.	
77	5.3-15	Vol. 2, Table 5.3-4	18 AAC 75.425(e)(1)(F)	The Name Plate for the Crucial 100 disc does not correspond to the information in the September 4, 2015 ADEC Decision on VMT Request for Assessment of Skimmer Efficiency letter. Please update with the approved oil recovery rate (ORR) information in this letter.	
78	5.3-15	Vol. 2, Table 5.3-4	18 AAC 75.425(e)(1)(F)	Footnote 2 is referenced as 629 x 2= 1,258 ² which looks like a mathematical expression. Add a space between 1,258 and the footnote for clarity.	
79	4.1-3	Vol. 3, Section 4.1.2	18 AAC 75.425(e)(1)(F)	Ensure that the manning for the tugs meets the requirements for the tactic VMT-OW-1.	
80	4.1-3	Vol. 3, Section 4.1.2	18 AAC 75.425(e)(1)(F)(iv)	Include details in the Operational Considerations of this section on how FLIR and/or X-Band technology will be used to ensure that OSRBs are in the thickest oil.	
81	4.1-3	Vol. 3, Section 4.1.2	18 AAC 75.425(e)(1)(F)(iv)	Will there be interruption of FLIR and/or X-Band technology for oil tracking if the tug is used on the hip of the barge?	
82	4.1-3	Vol. 3, Section 4.1.2 or other	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Include additional strategies on how encounter rates for Open Water Task Forces will be increased if necessary for OSRBs, since the gated U-boom is being removed from the majority of the Open Water Task Forces.	

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#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
83	4.1-3	area in the plan Vol. 3, Section 4.1.2	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	What job title/position will be the Task Force leader for the VMT-1-OW Tactic? Include in the tactic VMT-OW-1 similar information as in the TransRec tactic (VMT-OW-6).	
84	4.1-3	Vol. 3, Section 4.1.2 or other are in the plan	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Ensure that debris management resources are available for all VMT-OW-1 Task Forces. Provide additional detail on available resources to collect debris and associated timing.	
85	VMT-OW-1	Vol. 3, Section 4.1	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Provide documentation of demonstrations of all configurations of new OSRBs under tactic VMT-OW-1.	
86	VMT-OW-1	Vol. 3, Section 4.1	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Can the OSRBs utilize both ocean busters with the tug on the hip of the barge? Update the tactic if necessary.	
87	VMT-OW-1, 2, 4, and 5; VMT-NS-4	Vol. 3, Section 4 and 5	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Provide documentation on demonstrations of applicable nearshore and open water response tactics with new ECO personnel.	
88	VMT-OW-1	Vol. 3, Section 4.5	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Include encounter rate strategies that can be used with the new OSRBs in the tactic VMT-OW-1. Provide details on the operational limitations and abilities.	
89	VMT-OW-5	Vol. 3, Section 4.5	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Provide information on the location of the boom for this tactic.	
90	4.2-2	Vol. 3, Figure 4.2-1 and	18 AAC 75.425(e)(1)(F)(vii)	Line Boat is changed to Work Boat or Suitable Vessel. Update terminology to Support Vessel for consistency with other locations in the plan.	

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#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
91	4.2-3	Figure 4.5-1 Vol. 3, Section 4.2	18 AAC 75.425(e)(1)(F)(vii)	Provide justification that a Support Vessel will be able to perform required tasks. Line Boat is removed and updated with Work Boat/Support Vessel. For consistency, update to remove Work Boat, because Support Vessel is used in other locations in the plan.	
92	4.2-3	Vol. 3 Section 4.4	18 AAC 75.425(e)(1)(F)(vi)	Ensure that the Open Water U and J tactics are updated for the changes in the Open Water tactics.	
93	4.2-13	Vol. 3, Section 4.4	18 AAC 75.425(e)(1)(F)(vi)	Are the tugs ever used to perform the Open Water U and J tactics? Update the tactic if so.	
94	4.6-1-3	Vol. 3, Section 4.6	18 AAC 75.425(e)(1)(F)(vii)	Ensure that information on TransRec tactics remain in the plan since the equipment is still available.	
95	5.1-2	Vol. 3, Table 5.1-1	18 AAC 75.425(e)(1)(F)(vii) 18 AAC 75.425(e)(1)(F)(ix)	Identify positions that can fill the role of Task Force leader and group supervisor in the Nearshore tactic?	
96	8.1-3	Vol. 3, Table 8.1-2	18 AAC 75.425(e)(1)(G)	Include which two ASD 4517s have the spill spray equipment.	
97	12.3-2	Vol. 3 Table 12.3-1	18 AAC 75.425	Update Table 12.3-1 if needed.	
98	12.4-2	Vol.3 Table 12.4-1	18 AAC 75.425(e)(1)(F)(ix)	For Open Water Barge 1 and 2, should it not state OSRB 1, OSRB 2, OSRB 3, or OSRB 4 to correspond with the Task Force Number? Ensure Open Water Task Force naming consistency.	

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#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
99	12.4-2	Vol.3 Table 12.4-1	18 AAC 75.425(e)(1)(F)(vii)	Clarify in footnote * that the two Open Water Task Forces that are required to be in Port Valdez are for Crucial Skimming (not Valdez Star Task force).	
100	12.4-2	Vol.3 Table 12.4-1	18 AAC 75.425(e)(1)(F)	Clarify which vessels are considered towing vessels in foot note **.	
101	12.5-2	Vol. 3, Table 12.5-2	18 AAC 75.425(e)(1)(F)	Include information on the specific ASD 3212s and ASD 4517s to Table 12.5-3.	
102	12.5-2	Vol. 3, Table 12.5-3	18 AAC 75.425(e)(1)(F)(ix)	Include information about the four specific OSRBs that will be available for use in the VMT plan.	
103	12.5-3	Vol. 3, Section 12.5	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	The number of Support Vessels needs to compensate for the deletion of Line Boats in Table 12.5-4.	
104	12-3	Vol. 3, Section 12.1	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Update the transit speeds for Support Vessels in the system in Table 12-1.	
105	Section 12	Vol. 3, Section 12.7, 12.5 or where applicable	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Include details on Support Vessels similar to the level of details provided for fishing vessels in Section 12.7. The role of Support Vessel is diverse and is called out in a variety of tactics. Additional details and descriptions including the vessel types, vessel crewing, training, and operational considerations for Support Vessels is needed to ensure the suitability of Support Vessel types.	
106	12.5-2	Vol.3, Section 12.5 (and other places in the plan)	18 AAC 75.425(e)(1)(F)(ix)	Explain the change in capacity for the Mineral Creek to 150,000 bbls. Ensure consistency throughout the plan.	

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#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
107	12.5-4	Vol. 3, Table 12.5-6	18 AAC 75.425(a)	Information on the TransRec skimmers needs to remain in the plan as a type of skimmer that is available for a response.	
108	12.5-6	Vol. 3, Table 12.5-7	18 AAC 75.425(e)(1)(F)(vii)	The number listed as Nameplate Recovery (BBL/HR) for the Disc Skimmer Crucial 100 Disc is the De-Rated Number. Update with the appropriate information.	
109	12.5-6	Vol. 3, Table 12.5-7	18 AAC 75.425(e)(1)(F)(vii)	For the Disc Skimmer: Crucial 100 Disc and Crucial 13 Disc, the De-Rated Recovery (BBL/HR) states Powerpack and Crane. Please update with the appropriate information.	
110	A.1-1 and throughout plan	Vol. 3, Appendix A	18 AAC 75.425	On pg. A.1-1 and A.6-1 clarify if A is a section or appendix.	
111	A.1-1	Vol. 3, Section A.1	18 AAC 75.425(e)(2)(D), 18 AAC 75.445	Consider removing "Type: Vessel" and include information on the intended use of the vessel.	
112	A.1-1	Vol. 3, Section A.1	18 AAC 75.425(e)(2)(D), 18 AAC 75.445	Provide specific information on the escort and towing winches in the vessel description for the ASD 4517, including type and size of the winches.	
113	A.1-1	Vol. 3, Section A.1	18 AAC 75.425(e)(1)(G)	Include which ASD 4517s have dispersant spraying equipment.	
114	A.1-1	Vol. 3, Section A.1	18 AAC 75.425(e)(3)(A)	Will all the ASD 4517s have firefighting systems? Please identify in the plan which vessels will have the firefighting systems.	
115	A.1-1	Vol. 3, Section A.1	18 AAC 75.425(e)(1)(F)(ix)	Include recovered oil storage capacity for skimming operations for ASD 4517s.	
116	A.1-1, A.1-4	Vol. 3, Section A.1	18 AAC 75.425(e)(2)(D), 18 AAC 75.445	What are the methods of preventing towing equipment and lines on the ASD 4517 and ASD 3212 from becoming frozen due to accumulation of snow and ice?	

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#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
117	A.1-1 through A.1-4	Vol. 3, Section A.1	18 AAC 75.425(e)(1)(F)	Include the Gross Tonnage for vessels.	
118	A.1-1 through A.1-4	Vol. 3, Section A.1	18 AAC 75.425(e)(1)(F)	Include the vessel Horsepower in the plan.	
119	A.1-1 and A.1-4	Vol. 3, Appendix A	18 AAC 75.425(e)(1)(F)	The speed prediction for towing a barge for the ASD 4517s and ASD 3212s does not state if the barge is laden or not. Provide speed prediction documentation for ASD 4517 and ASD 3212 for various load stages of a barge.	
120	A.1-1 and A.1-4	Vol. 3, Appendix A	18 AAC 75.425(e)(1)(F)	Provide a speed prediction for ASD 4517s and ASD 3212 for towing the Mineral Creek.	
121	A.1-1 and A.1-4	Vol. 3, Appendix A	18 AAC 75.425(e)(1)(F)	Provide the ABS and USCG correspondence that details the acceptance of the vessel designs for the ASD 4517s and ASD 3212s.	
122	A.1-4	Vol. 3, Section A.1	18 AAC 75.425(e)(2)(D), 18 AAC 75.445	Provide specific information on the bow and stern winches in the vessel description for the ASD 3212, including type and size of the winches.	
123	A.1-4	Vol. 3, Section A.1	18 AAC 75.425(e)(2)(D), 18 AAC 75.445	Will the ASD 3212 be classified as an escort towing vessel? If so, provide the supporting documentation.	
124	A.1-4	Vol. 3, Section A.1	18 AAC 75.425(e)(2)(D), 18 AAC 75.445	Consider removing "Type: Vessel" and include information on the intended use of the vessel.	
125	A.1-4	Vol. 3, Section A.1	18 AAC 75.425(e)(2)(D), 18 AAC 75.445	Typo: Under Towing Equipment: 75 10" circumference Armsteel Blue or Equivalent, update to include units such as 75m 10" circumference...	
126	A.1-4	Vol. 3, Section A.1	18 AAC 75.425(e)(3)(A)	Include which ASD 3212s have the firefighting systems aboard.	

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#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
127	A.1-5	Vol. 3, Section A.1	18 AAC 75.425(e)(1)(F)(vii)	Information on the Line Boat has been removed and the role of the Line Boat has been replaced by Support Vessels. Include a general vessel description of Support Vessel.	
128	A-5	Vol. 3, Appendix A	18 AAC 75.425(e)(1)(F)(ix)	Is information on the 450-7 being removed from the plan? The deletion of the 450-7 is not in the submitted amendment.	
129	A-5	Vol. 3, Appendix A	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Provide documentation for demonstrations of the Mineral Creek in its new intended role.	
130	A.6-1	Vol. 3, Appendix A	18 AAC 75.425(e)(1)(F), 18 AAC 75.445	Identify the locations of the West Coast power packs.	
131	A.1-8	Vol. 3, Section A.1	18 AAC 75.425(e)(2)(D), 18 AAC 75.445	What classification will the OSRBs have? Please include in the vessel description.	
132	A.1-8	Vol. 3, Section A.1	18 AAC 75.425(e)(1)(F)(ix)	Explain why there are no thrusters on the OSRBs.	
133	A.1-8	Vol. 3, Section A.1	18 AAC 75.425(e)(1)(F)(ix)	Ensure all axillary equipment is included and accurate for the OSRBs.	
134	A.1-8	Vol. 3, Appendix A	18 AAC 75.425(e)(1)(F)(ix), 18 AAC 75.445	What intact stability standard will the OSRBs be expected to meet? Will the OSRBs be expected to meet intact stability requirements under tow and at anchor? In what loading conditions will the OSRBs be expected to meet intact stability requirements? Provide documentation for these.	
135	A.1-8	Vol. 3, Appendix A	18 AAC 75.425(e)(1)(F)(ix), 18 AAC 75.445	What damage stability/subdivision standard will the OSRBs be expected to meet? Will the OSRBs be expected to meet damage stability/subdivision requirements under tow and at anchor? In what loading conditions will the OSRBs be expected to	

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#	Page	Section	Regulation 18 AAC 75.###	Comment/Recommendation	Plan Holder Response
136	A.1-8	Vol. 3, Appendix A	18 AAC 75.425(e)(1)(F)(ix), 18 AAC 75.445	meet damage stability/subdivision requirements? Provide documentation for these. Will the OSRBs be expected to meet intact stability and damage stability/subdivision requirements in icing/snow conditions? Provide documentation for this.	
137	A.1-8	Vol. 3, Appendix A	18 AAC 75.425(e)(1)(F)(ix), 18 AAC 75.445	How will snow and ice be removed from decks on the OSRBs?	
138	A.1-8	Vol. 3, Appendix A	18 AAC 75.425(e)(1)(F)(ix), 18 AAC 75.445	What are the methods of preventing towing equipment and lines on the OSRBs from becoming frozen due to accumulation of snow and ice?	
139	A.1-8	Vol. 3, Appendix A	18 AAC 75.425(e)(1)(F)(ix), 18 AAC 75.445	What are the methods of preventing piping systems and drains from freezing on the OSRBs?	
140	A.1-8	Vol. 3, Appendix A	18 AAC 75.425(e)(1)(F)(ix)	Clarify the length of the OSRB at waterline for various load stages. This information is necessary to confirm the barge information used in the speed prediction models is appropriate.	
141	A.1-8	Vol. 3, Appendix A	18 AAC 75.425(e)(1)(F)	Provide the ABS and USCG correspondence that details the acceptance of the vessel designs for the OSRBs. Also, provide the load line certificates for the OSRBs.	
142	A.1-9	Vol. 3, Section A.1	18 AAC 75.425(e)(1)(F)(ix)	Include the official numbers and specific OSRB names in the description.	
143	A.1-9	Vol. 3, Section A.1	18 AAC 75.425(e)(1)(F)(ix)	Include information on the wavebreaks and if the barge is equipped to go offshore.	
144	A.1-11	Vol. 3, Section A.1	18 AAC 75.425(e)(1)(F)(ix)	Vessel information on the Oil Storage barge Mineral Creek as a Lightering Barge needs to be included in the plan.	

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#	Page	Section	Regulation	Comment/Recommendation	Plan Holder/Response
145	B-21	Vol. 3, Section B	18 AAC 75.425 18 AAC 75.425 (e)(1)(F), 18 AAC 75.445	Under 'Determine support crew and resource requirements...' Please clarify and update if necessary: R/C, Response Action Contractor Solomon Gulch Hatchery.	