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Citizens promoting the environmentally safe operation of the Alyeska terminal and associated tankers.

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Environmental Coalition

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Aquaculture Corporation

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December 15, 2023

Commander, 17th Coast Guard District
Attn: LT Case Kuikhoven (dpi), Room 753
P.O. Box 25517
Juneau, AK 99802

SUBJECT: Prince William Sound Regional Citizens' Advisory Council
Recertification Application for January - December 2024

Dear RADM Megan Dean:

The Prince William Sound Regional Citizens' Advisory Council (PWSRCAC or the Council) hereby applies for recertification as the alternative voluntary advisory group for Prince William Sound, per Sec. 5002 (o) of the Oil Pollution Act of 1990.

This application is submitted under the guidelines in the U.S. Coast Guard's September 16, 2002, Federal Register notice which established a streamlined recertification process for two years out of every three. The notice stated that a streamlined application need only "describe any substantive changes to the information provided at the last triennial recertification." The year covered by this application falls under the guidelines for the streamlined process. Substantive changes for 2023 are summarized below.

Broad Representation and Involvement in the Region

The Council has continued to facilitate meetings and other activities in hybrid format. This includes all three of our Board meetings, which were held in Anchorage in January, Valdez in May, and Homer in September. Staff continue to look for ways to improve the online experience for our volunteers and the public during in-person meetings. Public receptions were held in Valdez and Homer, in addition to presentations and outreach events in Seward, Kodiak, Valdez, Whittier, Homer, and Ninilchik. Announcements for meetings were provided beforehand.

Board membership continues to remain strong with 20 seats filled. New citizen volunteers have been added to our technical committees.

As we shared in February 2023, as part of the last "heavy" application cycle, at the Council's January 2023 Board meeting, a Temporary Recreation Seat was added to the list of Class I Board members, to remain in place until a full request for qualifications (RFQ) could be conducted to potentially fill a permanent seat. The RFQ solicitation resulted in three entities submitting proposals: Valdez Adventure Alliance, Prince William Sound Stewardship Foundation, and Friends of Kachemak Bay State Parks. Those entities are now working to form a coalition for the

permanent seat on the Council's Board. As of the writing of this letter, the Council has received the coalition's Memorandum of Agreement and it is moving through the Council's committee approval process, per our bylaws, policies, and procedures. The recreation seat issue is anticipated to be moved to the Board for the required bylaws change and approval for seating at the January 2024 Board meeting.

As you know, the Council falls under the "(o) Alternative Voluntary Advisory Group in Lieu of Council" subsection of OPA 90, Section 5002. The Council believes, per our legal counsel, that we are in compliance with subsection (o) without a designated recreation seat. With that said, the organization strives to adhere to OPA 90 mandates as closely as possible and so has proceeded with the RFQ process in the interest of addressing concerns expressed by Coast Guard staff during the previous application cycle.

Partnerships with Stakeholders and Affiliates

Weather Data, Monitoring, and Forecast Models

These projects study wind, water currents, and other environmental factors near the Valdez Marine Terminal (VMT), in Prince William Sound, and in the Gulf of Alaska, as these factors may affect the ability to prevent, respond to, contain, and clean up an oil spill. The Council supports three weather stations in Prince William Sound and the Gulf of Alaska. Information is collected via the Prince William Sound Weather Station Network, developed and maintained by the Prince William Sound Science Center, and co-funded by the Council. Data is available through the Alaska Ocean Observing System (AOOS).

The most recent addition to the weather station network was installed at Kokinhenik Bar on the Copper River Delta in June 2023. The Copper River Valley can funnel extremely high offshore winds when there is a high-pressure system over interior Alaska and a low-pressure system over the Gulf of Alaska. This weather station provides real-time observations of wind and other weather parameters, available to mariners in the region. Data collected complements the existing Council weather station at Cape St. Elias and SNOTEL weather station on Strawberry Reef, which both tend to under-report northerly winds.

The Council also maintains two weather buoys in Port Valdez: one near the terminal, the other near the Valdez Duck Flats. These buoys measure ocean currents, wind, and waves among other factors, and the Council has been analyzing the data to identify trends over the last five years. The Council works with AOOS and the National Oceanic and Atmospheric Administration's (NOAA) PORTS® (Physical Oceanographic Real Time System) to share the data. As part of the PORTS® program for Port Valdez, the Council worked with NOAA's National Ocean Service to install a CTD (conductivity, temperature, and depth) sensor at the Kelsey Dock in Port Valdez. The sensor was made possible through a grant from AOOS. Data from the CTD sensor is made available on the Port Valdez PORTS® site and through AOOS.

Progress Toward More Effective Communications

Regular Meetings with Alyeska Senior Managers and Marine Safety Unit (MSU) Valdez

Over this past year, Council staff have continued a series of monthly meetings with senior leaders from Alyeska and Alyeska's Ship Escort Response Vessel System (SERVS). Council staff also coordinates with the Commander of the local MSU in Valdez and participates on the

Valdez Marine Safety Committee. Commander Sarah Rousseau, Captain of the Port and Federal On-Scene Coordinator for Prince William Sound, regularly attends Council Board meetings, while other MSU Valdez representatives regularly attend Council technical committee meetings. The intent and success of these regular meetings has been to review substantive issues of mutual concern; share ongoing projects, research, and priorities; explore opportunities for alignment and cooperation; and encourage open communications. An additional meeting was held with Sector Anchorage personnel to discuss several topics pertaining to regional and area oil spill planning issues.

The Council continues to support the Coast Guard on the issue of replacing the 3-decades-old radar systems in the Sound. Over the last several years, these systems have encountered significant periods of inoperability due to equipment casualties and challenges associated with acquiring the necessary parts to repair them due to the age of the systems.

Coordination with Alaska's Congressional Delegation

The Council communicated with the Delegation on pressing concerns that are directly related to oil spill prevention and response, including on several occasions regarding the inoperable VHF and radar equipment in the Sound. The Delegation, working directly with the Coast Guard, was able to secure funding for repairs to the VHF radios in Prince William Sound and the Council continues to work with the Delegation to get the radars replaced.

Strengthening Ties with Citizens' Councils

The Council continues to strengthen our working relationship with Cook Inlet RCAC, including regular meetings between the executive directors and joint letters on issues of importance to the councils. Fostering collaboration and trust between the citizens councils is a priority for PWSRCAC and these efforts are expected to continue.

Collaboration with Partners

Council staff meet monthly with representatives from the Alaska Department of Environmental Conservation (ADEC), as well as with other regulatory agencies as needed, such as the Bureau of Land Management (BLM), and other PWSRCAC ex officio members. Council staff continue to participate in the quarterly Valdez Marine Terminal Coordination Workgroup meetings whose members include Alyeska, ADEC, BLM, the Coast Guard, and the Environmental Protection Agency (EPA). This workgroup is tasked with providing an open forum for communicating on the terminal contingency plan, with a goal of continuous improvement to the plan, and has been meeting since 2003.

The Council has been an active participant in the Regional Stakeholder Committee (RSC) Task Force with the Alaska Regional Response Team agencies, including the Coast Guard, EPA, ADEC, Tribal organizations, industry, and others. The group is working to construct job aids for liaison officers to help manage the RSC process and for RSC members themselves.

Over the course of the past year, the Council has attended monthly meetings with representatives from Marathon Petroleum Company, one of the Trans Alaska Pipeline System (TAPS) owner companies, and met on an as-needed basis with the other TAPS shippers, to discuss oil spill prevention and response issues and concerns of mutual importance.

We recognize that positive relationships and regular communications are critical components to achieving our mission. The Council remains committed to strengthening and continuing to build relationships with our stakeholders, industry, and regulatory partners.

Monitoring Terminal Operations and Maintenance

Risks and Safety Culture at the Valdez Marine Terminal

In April 2023, the Council released an assessment of risks and safety culture at the VMT. This report was initiated in response to safety concerns brought to the Council by concerned current and former Alyeska employees. After reviewing all available information, the main conclusion of the report is that there currently is an unacceptable safety risk to the terminal. According to the concerned individuals interviewed, availability of resources, quality and audit functions, maintenance and system upgrades, and operational integrity and compliance have all suffered significantly under recent corporate management. Pressure to reduce budgets was a common theme. Government budget pressures and reductions in staffing have also contributed to the challenges, including at BLM and ADEC.

The report emphasized that the concerned Alyeska employees all cared deeply about the safe operation of the terminal, and the safety of their colleagues, the community, and Prince William Sound. It credits the integrity, knowledge, and skill of the Alyeska workforce for holding together aging infrastructure.

The Council endorsed all recommendations in the report, including a request that Congress initiate a Government Accountability Office audit to determine the adequacy of the present regulatory oversight of terminal operations by federal and state agencies. Other recommendations for the State of Alaska, federal Occupational Safety and Health Administration, Alyeska, and the TAPS owners can be found on the Council's website.

Alyeska has shared with the Council that they have formed a team to look into issues noted in the report and identify actions to address them. The Council is encouraged by this response and stands ready to support Alyeska, and state and federal regulatory agencies, in our role as an advisor.

Ensuring the Adequacy of Secondary Containment Liners

The secondary containment system cells surrounding the VMT's crude oil storage tanks are lined with a special type of asphalt, which can become brittle with age and is susceptible to physical and chemical damage. Identifying damage is difficult, as the liner is covered with between 3-5 feet of gravel. Over the years, when gravel fill has been removed to visually inspect the liner, holes or cracks have been found about 20% of the time. Removing the fill to inspect and repair the liner would be expensive, and excavation equipment could cause further damage.

To help identify solutions, the Council commissioned research on non-destructive methods to evaluate the integrity of the liner, to verify it will reliably hold spilled oil as designed. In January 2023, the Council released a report showing how electric leak location surveys can be used to identify potential damage in the liners that are almost 50 years old. It was also determined

that at least 20% of the liner would need to be tested to have confidence that the information provided by the testing could be applied to the entirety of the secondary containment liner, estimated to cover approximately 52 acres.

In May 2022, ADEC notified Alyeska that they needed to identify preliminary methods to evaluate the integrity of the liners by October 2023, and must identify final evaluation methods by March 2025. In September 2023, Alyeska notified ADEC that they would be using Geoelectric Leak Location as the non-destructive testing method to evaluate the integrity of the liner in accordance with ADEC's Condition of Approval issued as part of the VMT contingency plan.

Study of Oxygenated Hydrocarbons from Terminal Operations

This study investigated the VMT's process of removing crude oil residue from unsegregated tanker ballast water, specifically regarding oxygenated hydrocarbons and heavy metals. Oxygenated hydrocarbons are currently not monitored or regulated because they cannot be detected with the same process as other components of crude oil, such as benzene, toluene, ethylbenzene, and xylene.

Researchers sampled water at four different points in the ballast water treatment process. They found that one of the steps in the treatment, which uses dissolved air to remove small particles of hydrocarbons from the water, may lead to the formation of oxygenated hydrocarbons that are then released in the effluent to Port Valdez. The report highlights the need for comprehensive monitoring of ballast water treatment processes.

Monitoring PFAS Spills and Use at the Terminal

In addition to oil spill monitoring, the Council has also been closely monitoring spills of per- and polyfluoroalkyl substances (PFAS) contained in fire-fighting foam from the VMT. The Council is tracking work by Alyeska to shift from a PFAS-based fire-fighting foam to a PFAS-free foam, or one that uses a more environmentally friendly fire-fighting system. The Council supported Alaska legislation to address the PFAS issue that passed in the House and Senate in 2023, but was vetoed by the Governor.

Long-Term Environmental Monitoring

Every year, the Council collects environmental samples and has them chemically analyzed for oil contamination related to the operation of the terminal and TAPS tankers. As planned, the Council collected samples of blue mussels and marine sediments and deployed passive sampling devices for analysis. The Council also conducted and supported monitoring work pertaining to invasive species and marine birds in Prince William Sound.

Gene Analysis to Improve Understanding of Oil's Effects

In 2019, the Council began looking at new methods to measure the impacts of oil on the environment. A new research technique, called transcriptomics, was used to analyze the genes of blue mussels to measure how environmental conditions affect expression of particular genes.

After approximately 1,400 gallons of oil was spilled into Port Valdez from the terminal in April 2020, mussels were compared from three areas: within the spill site, near the Valdez harbor, and a control site. The oil levels in the mussels were found to have declined by August; however, the mussels' genes showed evidence of lingering effects. The research also expanded the study from 14 genes to more than 7,000.

Recently, researchers tried to identify how gene expression varied based on different contaminants. Crude oil-contaminated samples were compared to samples from the Valdez harbor, which were contaminated with pollutants such as diesel fuel or vessel exhaust, and the control site. Genes associated with stress and the immune system were among those that varied between the three sites.

While these studies will help improve the Council's monitoring program, the researchers noted that the findings could potentially improve monitoring in marine environments around the world.

Preparing to Respond to Oil Spills

Drills and Exercises

PWSRCAC continues to monitor, evaluate, and participate in exercises and training events for the TAPS tankers and the terminal. Council staff was limited in this activity during the 2020 to early 2022 timeframe due to the pandemic, but more typical access has since returned. Staff participated in 30 events in 2023, including an annual training for the contracted vessel response fleet, large-scale tabletop exercises, open water and nearshore-specific equipment deployment exercises, and more specialized trainings for wildlife and dispersant monitoring.

Analyzing the Properties of Alaska North Slope Crude Oil

In 2019, the Council initiated a laboratory analysis of Alaska North Slope crude oil. The final data were received this year, after delays due to the COVID-19 pandemic. The Council conducts this analysis on a regular basis because properties such as density and viscosity can vary, depending on the location from where the oil is extracted and the age of the field.

The final interpretation of the analysis examines properties that would affect oil spill response measures including mechanical (e.g., booms, skimmers) and non-mechanical (e.g., dispersants). The data showed that oil arriving at the terminal is now lighter, of medium viscosity, and not likely to form permanent emulsion, among other findings.

State Funding for Oil Spill Prevention and Response

The Council has always been an advocate for adequate state funding for oil spill prevention and response. During the 2023 legislative session, the Council closely followed and provided support for Senate Bill 137 which would secure sustainable funding for ADEC's Division of Spill Prevention and Response. This bill called for a half a penny per gallon increase to the refined fuels surcharge.

Support for a Sentinel Class Cutter in Valdez

In September 2023, the Council's Board approved a resolution urging the Coast Guard to

replace the Island Class Cutter currently stationed in Port Valdez with a Sentinel Class Cutter. The current cutter will remain at its post in Valdez for now, but upon its decommissioning it is not currently planned to be replaced.

Valdez Marine Terminal and Prince William Sound Tanker Contingency Plans

The Council continues to participate in reviewing the contingency plans for the VMT and TAPS oil tankers. Earlier this year, the Council provided comments on the Prince William Sound tanker contingency plan major amendment. The contingency plan covering the VMT is currently up for its 5-year renewal. The Council has been conducting a review of the changes and plans to submit comments before the December 15, 2023, public comment deadline.

Resources to Support Industry and Communities

Sustainable Shipping

In 2023, the Council commissioned an analysis of the current and potential future environmental regulations which would affect tankers and the escort tugs that transit Prince William Sound. The report reviewed regulations in the U.S. and around the world on emissions commonly generated by ocean-going vessels and the types of fuels they use.

Updated Peer Listener Program

This year an update was completed to the Council's "Peer Listener Manual," an appendix of the award-winning guide for dealing with an oil spill, "Coping With Technological Disasters - A User-Friendly Guidebook." The fields of peer-to-peer support and mental health have evolved substantially since the manual was created shortly after the Exxon Valdez oil spill occurred. The Council worked with a contractor to update the manual incorporating modern techniques for active listening, informal support, and self-care. The manual is a resource for communities to build resilience before a disaster by building trust and mutual support networks.

Sharing Information on our Work

Outreach included visits to communities throughout our region, attending Council member functions, giving presentations, coordinating special events, and encouraging citizen involvement in the Council's work. The Council presented its booth at the Alaska Forum on the Environment, ComFish Alaska, the Prince William Sound Natural History Symposium, Pacific Marine Expo, and as part of the education content at Salmonfest. In-person, hybrid, and virtual presentations to share Council information and connect with communities took place across our region, including at Prince William Sound College, Gilson Middle School (Valdez), and Alaska Geographic's Teacher Field Courses. A virtual presentation on our citizen oversight model was also given to an emergency preparedness group in New Orleans, LA.

Youth Involvement Program

Opportunities for youth supported by the Council included independent environmental research by undergraduates in Valdez; marine summer camps and internships for youth in Kachemak Bay; and multiple field excursions into the Sound for youth from Cordova, Valdez, and elsewhere. The Council also had three high school students, from Cordova, Kodiak, and Valdez, participate in our aquatic invasive species monitoring internship program.

Local Educational Conferences

The Council supported two major hybrid events in 2023, the fifth annual PWS Natural History Symposium and the Alaska Forum on the Environment. The Symposium included 26 speakers presenting to a hybrid audience of over 230 participants and included a presentation by the Council on our activities. Staff helped organize the oil spill track of the Forum, which this year included a presentation on a Council-sponsored field trial and report about emergency towing technology. Staff also helped organize and facilitate the Alaska Invasive Species Partnership annual workshop, and the Council's aquatic invasive species intern from Kodiak presented his monitoring work to an audience of over 100 hybrid participants.

Fishing Vessel Program Community Outreach Tour

In May, the Council hosted our annual boat tour, this year in Valdez, for the public to view and learn about oil spill response training for contracted fishing vessels. 119 passengers including local middle school, high school, and college students as well as local media, partners, and other community members traveled aboard a chartered passenger vessel to observe SERVS on water training. Council staff and volunteers, and Alyeska/SERVS staff were on board to narrate and speak with local citizens about the key roles local fisherman and mariners have in oil spill response and the equipment being used in the training.

In Conclusion

We have kept this application brief in accordance with the streamlined recertification process for this year. This required the omission of many other worthwhile endeavors by the Council in our ongoing efforts to maximize the safety of terminal and tanker operations in Prince William Sound. We would be happy to provide additional details on any of the Council's activities. All reports accepted by the Council's Board of Directors are posted on our website. Enclosed is our 2022-2023 annual report ("Year in Review") which highlights and expands on some of the work mentioned in this letter.

Sincerely,



Donna Schantz
Executive Director

Enclosure: [PWSRCAC's 2022-2023 "Year In Review" Annual Report](#)

CC: Andres Morales, Alyeska Pipeline Service Company
Klint VanWingerden, Alyeska Pipeline Service Company