

Briefing for PWSRCAC Board of Directors – January 2026

INFORMATION ITEM

Sponsor: Linda Swiss, Joe Lally, TOEM Committee, OSPR Committee, Secondary Containment Project Team, C-Plan Project Team

Project number and name or topic: 6512 - Maintaining the Secondary Containment Systems at the VMT Update

1. **Description of agenda item:** The Board will be provided with an update on the process of reviewing Alyeska’s proposed testing methods to evaluate the integrity of the Valdez Marine Terminal’s (VMT) East Tank Farm (ETF) catalytically blown asphalt (CBA) secondary containment liner system. A comprehensive update from 2019 to the present is available [HERE](#). This update will focus on more recent activity related to the VMT’s Oil Discharge Prevention and Contingency Plan (ODPCP or C-Plan) from the November 6, 2024 approval. The 5-year renewal of the VMT C-Plan was approved by the Alaska Department of Environmental Conservation (ADEC) on November 6, 2024, and it expires on November 5, 2029.

2. **Why is this item important to PWSRCAC:** This item is important to PWSRCAC because the secondary containment liners in the East Tank Farm are there to prevent the contamination of ground and surface water in the event of an oil or other hazardous liquid spill. If the integrity of the secondary containment liner (also known as the catalytically blown asphalt liner or CBA liner) is compromised, such as having through holes, cracks, and gaps, the risk of an oil spill causing environmental damage increases. To date, visual inspections of the CBA liners in the East Tank Farm have shown areas where the liner integrity was compromised. Alyeska receives a 60% prevention credit from the Response Planning Standard volume from a catastrophic spill for a “sufficiently impermeable secondary containment liner.” PWSRCAC has been following this issue for more than 20 years and has questioned the reasonableness of this prevention credit when the integrity of the liners cannot be verified. This secondary containment liner integrity issue was also the subject of a 2024 Request for Informal Review and a 2025 Request for Adjudicatory Hearing.

3. **Previous actions taken by the Board on this item:**

Meeting	Date	Action
XCOM	12/4/19	Authorized staff to submit requests for informal review on VMT C-Plan renewal.
Board	1/27/22	Approval to authorize Executive Director to file request for adjudicatory hearing on the VMT C-Plan related to secondary containment liner.
XCOM	4/28/22	Approval of contract with Dr. Craig Benson for secondary containment liner work.
Board	1/26/23	Accepted report “Methodologies for Evaluating Defects in the Catalytically Blown Asphalt Liner in the Secondary Containment System at the Valdez Marine Terminal” by Dr. Craig Benson dated 11/29/22 as meeting the terms of contract

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		6512.22.02; direct staff to send report to Alyeska, state and federal regulators with cover letter.
Board	11/26/24	Authorized staff to request an informal review on the VMT C-Plan renewal on COA #1 on the VMT C-Plan renewal related to the secondary containment liner.
Board	3/19/24	Authorized Executive Director to request an adjudicatory hearing on COA #1 on the VMT C-Plan related to the secondary containment liner.

4. **Committee Recommendation:** The C-Plan Project Team, Secondary Containment Project Team, and members of the TOEM and OSPR Committees have been updated on this issue.
5. **Relationship to LRP and Budget:** Project 6512 – Maintaining the Secondary Containment Systems at the VMT is in the approved FY2026 budget and annual work plan.
6. **Action Requested of the Board of Directors:** No action needed; informational only.
7. **Attachments:** None.