Briefing for PWSRCAC Board of Directors – September 2021

ACTION ITEM

Sponsor: Linda Swiss and the Oil Spill Prevention and Response Committee

Project number and name or topic: 6511 – History of Contingency Planning

1. **Description of agenda item:** This agenda item seeks Board acceptance of three documents on the history of the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan (PWS Tanker C-Plan) by Nuka Research and Planning Group. These reports provide a summary, timeline of key plan changes and related efforts, a compendium of summaries of plan renewals and key amendments, and tables listing the findings and conditions of approval issued by the Alaska Department of Environmental Conservation. These documents are:

- Prince William Sound Tanker Oil Discharge Prevention & Contingency Plan: Summary (1995-2020), DRAFT (August 10, 2021);
- Prince William Sound Tanker Oil Discharge Prevention & Contingency Plan: Compendium of Event Summaries (1995-2020), DRAFT (August 10, 2021); and
- Prince William Sound Tanker Plan History Timetable

Sierra Fletcher of Nuka Research and Planning Group will present to the Board on their approach in identifying key contingency planning issues for the Prince William Sound tankers as well as the organization of the information complied for these reports.

2. **Why is this item important to PWSRCAC:** Review of contingency plans is a major task for PWSRCAC as outlined in both the PWSRCAC/Alyeska contract and the Oil Pollution Act of 1990. As over 30 years have passed since the *Exxon Valdez* oil spill, it is important to capture and document the evolution of contingency planning for the tankers that transit Prince William Sound. This project has taken a long-term view of contingency planning in the years since the *Exxon Valdez* spill.

In recent years, PWSRCAC has observed rollbacks in regulatory oversight of the oil spill prevention and response system in Prince William Sound with the potential to reduce the level of safety many have worked to create here. To combat and prevent the complacency that led to the 1989 spill, it is important to identify where progress has been made and where protections may have decreased over time. Documenting changes to oil spill contingency plans, including changes in regulatory philosophy and industry commitments, provide a measure of progress. Contingency plan approvals include important issues that could potentially impact every member organization for the Council, as these plans outline prevention and response commitments by industry approved through regulatory agencies.

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

Meeting	Date	Action
Board	May 2020	Approved contract with Nuka Research and Planning Group

4. **Summary of policy, issues, support, or opposition:** The history of the PWS Tanker C-Plan will be used as a reference document for plan renewals and amendments. Tracking the history of issues addressed over the last three decades will help current and future plan reviewers understand the evolution of contingency planning in Alaska.

5. **Committee Recommendation:** The OSPR Committee recommended the Board of Directors accept the reports generated by this project.

6. **Relationship to LRP and Budget:** Project 6511 History of Contingency Planning is included in the FY2022 budget.

6511--History of Contingency Planning
As of July 31, 2021

FY-2022 Budget	
Original	$50,000.00
Modifications	
Revised Budget	$50,000.00
Actual and Commitments	
Actual Year-to-Date	
Commitments (Professional Services)	$20,000.00
Actual + Commitments	$20,000.00
Amount Remaining	$30,000.00

7. **Action Requested of the Board of Directors:** The Board is asked to accept the following documents written by Nuka Research and Planning Group:

- Prince William Sound Tanker Oil Discharge Prevention & Contingency Plan: Summary (1995-2020), DRAFT (August 10, 2021);
- Prince William Sound Tanker Oil Discharge Prevention & Contingency Plan: Compendium of Event Summaries (1995-2020), DRAFT (August 10, 2021); and
- Prince William Sound Tanker Plan History Timetable.

8. **Alternatives:** None recommended.

9. **Attachments:**

- Prince William Sound Tanker Oil Discharge Prevention & Contingency Plan: Summary (1995-2020), DRAFT (August 10, 2021);
- Prince William Sound Tanker Oil Discharge Prevention & Contingency Plan: Compendium of Event Summaries (1995-2020), DRAFT (August 10, 2021); and
- Prince William Sound Tanker Plan History Timetable

PRINCE WILLIAM SOUND TANKER OIL SPILL PREVENTION & CONTINGENCY PLAN

Summary (1995-2020)

Report to Prince William Sound Regional Citizens' Advisory Council
August 2021 DRAFT

Sharry Miller, Sierra Fletcher, Breck Tostevin, and Haley Griffin

nuka RESEARCH & PLANNING GROUP, LLC.

NK Nielsen | Koch PLLC

ACKNOWLEDGEMENTS

The authors take full responsibility for any errors or inaccuracies in this document. We extend our appreciation to the PWSRCAC staff who assisted us in accessing the numerous documents on which this report and the associated compendium document are based. PWSRCAC carries the records of more than 30 years of collaboration, cooperation, and, at times, conflict over how to ensure that oil spill prevention and response plan requirements put in place after the *Exxon Valdez* oil spill are fulfilled. Maintaining this record is not an insignificant effort but an important one.

Executive Summary

Prince William Sound Regional Citizens' Advisory Council (PWSRCAC) contracted Nuka Research and Planning Group, LLC and Nielsen Koch, PLLC to compile a history of the oil spill prevention and response plan for crude oil tankers operating in Prince William Sound. That history has played out through thousands of pages of documents, meetings and workgroups, and drills and exercises. This project spans the first plan developed under then-new state requirements put in place following the *Exxon Valdez* oil spill up through the State-approved plan that was in place in 2020. The plan structure, commitments, owners, and content has changed in that time under both State of Alaska requirements and State-approved operator-initiated revisions.

Under its Oil Pollution Act of 1990 mandate, PWSRCAC has been an active advisor on plans for oil spill prevention and response associated with crude oil operations in Prince William Sound this whole time.

The history compiled through this project focuses on issues and changes associated with Alaska Department of Environmental Conservation findings that elements of the plan are adequate and meet state regulations and the conditions of approval issued when the Department does not consider an issue to resolve at the time of plan approval. PWSRCAC comments are identified throughout the materials compiled which include: this summary report, a timeline of key plan changes and related efforts (e.g., workgroups), a compendium of summaries of plan renewals and key amendments, and tables listing the findings and conditions of approval. Together, these materials are intended to provide a resource for those interested in understanding how issues have been addressed over time and why certain elements of the plan are the way they are today. In many cases, they are the result of extensive, and often collaborative, effort by the plan holders, State, and PWSRCAC on behalf of its members.

Contents

Note: Two of the appendices referenced in this document are being circulated as separate documents for ease of review. These are:
1) a timeline (11 x 17 graphic) and
2) a compendium of summaries of the events identified on the timeline, many of which are mentioned in this summary report as well

PRINCE WILLIAM SOUND TANKER OIL DISCHARGE PREVENTION AND CONTINGENCY PLAN

Summary (1995-2020)

February 2021 - DRAFT

1. Introduction

As part of its Oil Pollution Act of 1990 mandate, the Prince William Sound Regional Citizens' Advisory Council (PWSRCAC) has been an active advisor on plans for oil spill prevention and response associated with crude oil operations in Prince William Sound for more than 30 years. The plan structure, commitments, owners, and content has changed in that time as regulations, oil shippers, equipment and vessels, and planning assumptions have evolved.

PWSRCAC contracted Nuka Research and Planning Group, LLC and Nielsen Koch, PLLC to compile a history of the oil spill prevention and response plan for crude oil tankers operating in Prince William Sound. This project documents the history of the plan from 1995-2020 that has played out through thousands of pages of documents, meetings and workgroups, drills and exercises both in rooms and on the water, and, most important, in ensuring that significant improvements in oil spill response preparedness in Prince William Sound developed shortly after the *Exxon Valdez* oil spill are sustained, effective, and, ideally, improved over time.

The project outputs are 1) a timeline of events related to plan development (with other events included for context), 2) a compendium of summaries of those events with references to the relevant documents and PWSRCAC comments, and 3) this summary report.

Background

The first oil spill contingency plan for crude oil tankers shipping oil through Prince William Sound was developed in 1976, in a document that covered spill response for the length of the Trans Alaska Pipeline System (TAPS) route, Valdez Marine Terminal, and oil tankers shipping crude oil from Valdez out through Prince William Sound. The U.S. government approved that plan in 1977, the same year that TAPS started flowing and Alaska enacted its first state regulations for oil spill contingency planning (DeCola and Robertson, 2018).[1]

The *Exxon Valdez* oil spill of March 24, 1989 triggered new federal and state laws governing oil spill prevention and response. Within two weeks, the Alaska Department of Environmental

[1] Earlier background on oil spill contingency plans for crude oil operations related to TAPS and associated tankers, state and federal requirements, and the legislative process and negotiations that ensued in the immediate aftermath of the *Exxon Valdez* can be found in *Alaska's Oil Spill Response Planning Standard: History and Legislative Intent* (DeCola and Robertson, 2018), also produced under contract to PWSRCAC.

Conservation (ADEC) had issued an Emergency Order requiring a significantly revised contingency plan to be developed within 38 days. Within a year, Alaska had enacted a new law that required separate planning for different elements of the TAPS system and established planning standards and other requirements for oil spill prevention and response for vessels and facilities operating statewide. The first Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan was approved in 1995 under the regulations stemming from that new law (DeCola and Robertson, 2018). While the plan has changed over time, the version that exists today stems from that 1995 version.[2]

Under ADEC regulations, the plan serves seven important functions. It is:

1. A "working" emergency plan;
2. A detailed long-term response plan with procedures;
3. A compliance demonstration of the access to equipment and resources required to meet the facility's or vessel's response planning standard and the separate ability to protect environmentally sensitive areas;
4. An assessment of past and potential spills at the facility and how they can be prevented;
5. A description of spill prevention measures required by the Article 1 regulations (18 AAC 75.005 - .085), federal prevention requirements, and company spill prevention measures at use at the facility;
6. A demonstration of the use of best available technology by the plan holder; and
7. A permit to operate that, if not followed, is a violation of law.

Alaska regulations require contingency plans that are very specific about how the operator of a particular facility and operator-specific descriptions and details on how oil spill containment and response will occur. An Alaska contingency plan is not a generic plan on how to respond to spills. Unlike federal response plans, Alaska's contingency plans do not simply rely on contracting with an oil spill removal organization with a specific level of resources. Nor is an Alaska contingency plan simply a "strategy and tactics" manual of an oil spill response contractor. Details matter when it comes to what an operator plans to do in the event of a spill. Alaska's contingency plans are operator-specific and facility-specific plans that address all seven critical objectives of a contingency plan.

Operators must renew their plan every 5 years (changed from every 3 years in 2003). Alaska regulations require plan holders to share plans for public review and comment upon submitting a renewal or a major amendment (see Section 3). Plan documents are also now posted on the ADEC website. Having this information available to the public is critical to allowing those concerned about an oil spill – or those who would bear the brunt of the impacts – able to review and understand how operators are preventing or preparing to respond to spills.

[2] The tanker plan has changed form over time but has always consisted of more than one volume. This report references the plan with the intent of encompassing the associated documents (multiple volumes or referenced technical manuals, for example) that, combined, indicate how those responsible will prevent, prepare for, and respond to an oil spill from a TAPS-trade tanker.

Project Approach

For this project, the team compiled a list of events that were in some way pivotal in the history of the plan from 1995-2020. These events included plan approvals, renewals, major amendments, legal action (court cases, adjudicatory hearings), work groups, and exercises. Not all work groups and exercises were included, but only those which either led to changes in or significantly validated the plan contents.

The events are identified on a timeline figure (Appendix A) and summarized in a compendium of event summaries (Appendix B). Input on the events was received from individuals familiar with the plan over the years including current and past PWSRCAC staff, board members, and volunteers. It is important to note, however, that the event summaries were developed based on review of extensive documentation and do not rely on recollections. This review was possible due to the to the tremendous effort by PWSRCAC staff to develop and maintain a comprehensive document management system which allowed the authors to search for necessary documents and helped to identify some missing events to complete the timeline.

2. Prince William Sound Tanker Plan

Formally known as the Prince William Sound Oil Discharge Prevention and Contingency Plan (ODPCP), the document has been colloquially called the plan, the c-plan, the tanker plan, and so on. For the purposes of this report, it will be called the plan. Other plans or subsections of this plan are designated with more specific titles.

Ownership/Roles

The plan is officially owned by the shipping companies that transport crude oil through PWS; they are required under State of Alaska statutes and regulations to have an approved oil discharge prevention and contingency plan in order to operate within the state. By statute, the crude oil shippers in PWS are required to use APSC as a common primary response action contractor [AS 46.04.030(q)]. The shipping companies have one common plan that describes how an oil spill would be prevented and, if necessary, responded to in PWS.

Under state regulations, however, each plan holder must have its plan approved separately by ADEC. Additionally, there are some operational differences between the shipping companies. Therefore, each plan holder separately and individually submits its plan to ADEC for approval. How those plans have been organized over time is discussed below.

Plan Organization and Changes over Time

State of Alaska regulations at 18 AAC 75.425 dictate what information must be included in a plan. The regulations divide the information into five parts:

1. Response Action Plan,
2. Prevention Plan,
3. Supplemental Information,
4. Best Available Technology Review, and
5. Response Planning Standard.

The way this information has been organized in the plan has changed over time. From 1995 to 2007, the plan consisted of three parts: Part 1. Response Action Plan, Part 2. Prevention Plan, and Part 3. Supplemental Information Documents (there were four "SIDs" in the plan). In print form, the plan filled several large three-ring binders.

For the 2007 renewal, the plan holders completely restructured the plan. They created what became known as the "core plan" which was divided into five sections to address the specific parts required by Alaska regulations (listed above). It is titled the *Prince William Sound Oil Discharge Prevention and Contingency Plan*. In addition, they created the *SERVS Technical Manual* which includes lists of the equipment and resources owned by APSC/SERVS as well as descriptions of the tactics showing how that equipment would be used during a response. These two volumes make up the plan that is the focus of this report.

Because the shipping companies have some operational differences, they are additionally each required to submit for approval a company-specific Vessel Response Plan. As a result, when a PWS crude oil shipping company submits a contingency plan for approval, it must submit three volumes: their Vessel Response Plan, the PWSODPCP, and the SERVS Technical Manual.

Related Documents

In addition to the plan, several other documents which describe prevention and response operations in PWS. Some of these are incorporated by reference into the plan.

- Vessel Escort and Response Plan (VERP): the VERP governs the ship escort guidelines and procedures in PWS in compliance with the requirements set out in OPA 90.
- Gulf of Alaska Agreement: an agreement between APSC and the shipping companies to provide oil spill response actions in the Gulf of Alaska region, the area of the USCG Prince William Sound Captain of the Port Zone, outside the three-mile limit of State waters, but including State waters in the area of Copper River Delta and Flats, extending to the 200 nautical mile offshore extent of the Exclusive Economic Zone.
- PWS Area Contingency Plan: a government plan intended to provide a coordinated and cooperative marine pollution response in PWS under the responsibility of ADEC and the USCG as co-chairs of the PWS Area Committee. (U.S. Coast Guard and ADEC, 2020)
- Alaska Regional Contingency Plan: a government plan for a coordinated federal, state, Tribal, and local response to a pollution discharge or threat of a discharge anywhere in Alaska, maintained by the Alaska Regional Response Team under ADEC, USCG, and U.S. Environmental Protection Agency (ARRT, 2018).
- Guidance documents: ADEC-issued guidance documents for operators subject to Alaska's oil spill prevention and response requirements. These are non-regulatory documents that provide further explanation and discussion of the regulations. The first was completed in 1994, with a new version in 2016 (ADEC, 1994; 2020).

3. Mechanisms for Plan Changes Over Time

Once a plan has been approved by ADEC, the plan holders cannot make any changes to it, no matter how insignificant, without applying for an amendment or renewal which must be approved by ADEC before the changes are made. A plan must be renewed every five years and undergoes the public review process defined at 18 AAC 75.455. Plan holders can elect to renew their plan sooner, but most plan changes between renewals are made by amendment. State regulations at 18 AAC 75.415 describe the amendment application procedures and distinguish between minor and major amendments. The regulations have been amended several times between 1995 and 2018 to delineate what are routine "minor" or major amendments.

An amendment is defined as major if it includes any of the following: an increase of the RPS volume; changes to the scenarios; expansion of operations to new physical environments; reductions to the amount or quality of prevention, response resources, or training; or changes that require an increase in prevention, response resources, or training. All major amendments must follow a public review process (as all plan renewals do).

Any changes that do not qualify as "major" can be approved by ADEC as minor amendments without public review.

Additionally, two amendment types are specifically defined as routine plan updates at 18 AAC 75.415: a deletion of a vessel operating under a plan that is not required as a response asset and a revision to spill command and response personnel contact information. These changes do not require ADEC approval, although ADEC must be notified of the changes within five days of when they go into effect.

Changes to the plan can also result from regulatory revisions, changes made during renewal of the plan, or when ADEC requires a change as a condition of approval. Conditions of approval typically require information to clarify or verify information that is already in the plan, not to add new analysis. In some circumstances, however, DEC has imposed conditions of approval requiring analysis of information not available at the time of renewal and later changes to the plan that then go through public review as major amendments. Appendix C includes all Conditions of Approval on the PWS tanker plan from 1995-2020.

The plan history timeline contained in this report includes references to numerous renewals and amendments, both major and minor. Summaries for these events describe the most important changes made with the actions. Some of these amendments were prompted by exercises or work groups which identified the need for change, and in most cases, summaries are included for those activities as well with references to the subsequent amendments where possible.

4. Key Topics in Plan Changes

More than four decades have passed since the first PWS tanker plan was approved, and regulations, operations, and the plan itself have undergone immeasurable changes. This history project has focused on changes to the plan since the first iteration of the current oil spill contingency planning regulations were adopted, but even in that shorter span of 25+ years, there have been myriad changes to the plan and operations.

To help make sense of all those changes, an attempt was made to characterize each of the events in the timeline by the most relevant topics addressed by the event. Once characterized, those topics that occurred repeatedly were identified as they were clearly ones of recurring concern over the years. The 17 topics identified are listed in the table below. Each topic was assigned an abbreviation which is used in the timeline and COA (Appendix C) and Findings (Appendix D) tables in this report to aid the reader in tracking the topics through history and the report. Brief descriptions of each topic and how they have played out over time follow the table.

Table 1: Event Topics

Topic	Abbreviation
Air Logistics	AL
Barges	B
Best Available Technology	BAT
Contracts/MOU/MOA	C
Escort Tugs	ET
Fishing Vessel Program	FV
Lightering	L
Nearshore	NS
Non-mechanical	NM
Oil Properties	OP
Personnel Numbers	PN
Response Equipment	RE
Realistic Maximum Response Operation Limitations	RMROL
Sensitive Area Protection and Geographic Response Strategies	SAP
Scenarios	S
Training	TR

Air Logistics (AL). The need for aircraft to support an oil spill response in PWS has been identified since the first plan approval in 1995. Indeed, aircraft are specifically listed in State of Alaska regulations as part of the equipment which must be identified for logistical support. [18 AAC 75.425(e)(3)(E)] Aircraft are needed for transportation, field monitoring, dispersant application, and more. Over the years, the plan holders have been asked to identify sources of aircraft, verify contracts for the service providers, and demonstrate the suitability of those aircraft for the intended purpose.

Barges (B). Response barges are a critical part of oil spill recovery operations in PWS, and serve a variety of purposes, including open water oil recovery and storage, secondary storage for nearshore response, lightering, and equipment storage and distribution sites. The suitability of the

barges for their tasks has been questioned several times during the life of the plan, particularly in the arenas of storage capacity, lightering, and nearshore response.

Best Available Technology (BAT). State of Alaska regulations require a BAT analysis and use of BAT in the areas of communications; source control procedures; trajectory analyses and forecasts; wildlife capture, treatment, and release; measure to assure prompt detection of an oil spill; operation of a tank vessel under escort; and escort vessels. [18 AAC 75.425(e)(4)]

Regulations for how the technologies are to be evaluated in the plan are located at 18 AAC 75.445. They require that a BAT review include comparisons to technology used in other comparable situations, transferability of the technology, reasonable expectation of improved prevention or environmental benefit protection, cost, age and condition of the technology, compatibility, feasibility, and environmental impacts.

The identification, definition, and inclusion of BAT in the plan has been a continual source of disagreement. Numerous RFAI have been written and addressed in findings documents, and court cases have been settled around the subject. The BAT review regulations are multi-layered and subjective, and it is up to ADEC's discretion whether or not an alternative technology must be considered BAT and adopted into the prevention or response system. Questions are still frequently raised about BAT, but changes in technology are seldom required.

One important determination that has been made about BAT is that it can be addressed through a "system approach" rather than by examining each individual piece of equipment or procedure used. The understanding is that if the response system, for example, is, as a whole, sufficient to meet regulatory requirements for containing, controlling, and cleaning up an RPS-sized oil spill then the system is considered BAT. The individual components of the system do not need to be subjected to a BAT review under regulation. The tanker escort tugs can also be evaluated under the systems approach, and the individual components on a tug (winches, bitts, etc.) are not individually subject to a BAT analysis.

Contracts, MOU, MOA (C). Alaska regulations require that "the plan holder shall maintain or have available under contract within the plan holder's region of operation or another approved location, sufficient oil discharge containment, storage, transfer, and cleanup equipment, personnel, and other resources" to contain, control and clean up an RPS volume of spilled oil. (18 AAC 75.432) Whether or not sufficient and/or appropriate contracts, MOUs, and MOAs have been in place to assure compliance has been questioned and answered repeatedly.

Escort Tugs (ET). Like barges, tugs in the system are critical to response operations, but they also play an important role in preventing oil spills. The tugs are used to move barges, carry equipment, and escort laden tankers through PWS. This last role is required by both the state and federal governments, and has been a source of close scrutiny, primarily from a BAT standpoint with regards to the general suitability of the tugs for the purpose, as well as the fitness of the tug components mentioned under BAT above.

Fishing Vessels (FV). The backbone of spill response in PWS could arguably be said to be the SERVS Fishing Vessel Program. This program has more recently been called the Vessel of Opportunity Program by APSC, but this is technically a misnomer as the vessels are under contract continuously, not just when opportunity arises. Over 400 FV are under contract to contain, control, and recover oil, protect sensitive areas, carry out wildlife operations, provide logistical support, and more. The numbers of vessels and training of crews has been analyzed carefully and repeatedly, and many important improvements have been made as a result.

Lightering (L). Although technically any movement of oil from one vessel or barge to another is lightering, in the context of this plan, the lightering of interest is the removal of retained (unspilled) oil from the stricken tanker to a barge or another tanker. The suitability and availability of a lightering barge and tanker (both are required in the plan scenarios) has been questioned repeatedly. APSC maintains, through their contracted tug and barge provider, a barge that is outfitted with lightering equipment. The capability of the barge has been assessed, but often of more interest is the availability of a tanker of opportunity to take over lightering duties before the barge is required to support nearshore response activities.

Nearshore Response (NS). The vast majority of SERVS resources are assigned to the nearshore response system, including most of the FV fleet. These resources are responsible for containing, controlling, and cleaning up oil that has escaped the open water recovery fleet and is in shallower or more constrained waters closer to shore, if not on shore already. Because they are working in more difficult areas and with a wider variety of equipment than the open water fleet, excellent training of the FV crews is especially important, and is indeed the focus of SERVS' annual training for FV crews. The quality of training, choice and maintenance of nearshore response equipment, and availability of vessels has been scrutinized closely and has been the subject of modeling and analysis, RFAI, work groups, exercises, and amendments.

Nonmechanical Response (NM). Perhaps the most contentious of all topics included here is that of nonmechanical response, namely the use of dispersants and *in situ* burning. Concerns have been repeatedly raised about the necessity, safety, efficacy, and monitoring of these response tactics, particularly dispersants. In addition, there has been a fear that dispersing the oil into the water column or the air would end up being prioritized over mechanical removal of oil from water. The plan holders and ADEC have asserted that non-mechanical response options are simply tools in the toolbox and will not be relied on preferentially over mechanical response options. The timeline includes amendments, work groups, exercises, and reports related to non-mechanical response operations.

Oil Properties (OP). The characteristics (API gravity, viscosity, temperature, etc.) of Alaska North Slope (ANS) crude oil have changed over time and depending on from which field on the North Slope the oil is produced. These characteristics can impact the way in which mechanical and non-mechanical spill response activities need to be carried out to be most efficacious, as well as storage requirements for emulsified oil. Oil properties were first discussed in the 1993 Anvil Study, and have been reexamined by work groups in subsequent years. The plan holders have committed to reexamining oil properties and any potential impacts on response operations prior to each plan renewal.

Personnel Numbers (PN). As noted earlier, the regulations at 18 AAC 75.432 require not only sufficient equipment to contain, control, and clean up spilled oil, but also sufficient people trained to carry out the response activities. These people have to be maintained within the region of operation, just as the equipment does. Significant effort has been expended by the plan holders, contractors, and work group participants to ensure that all personnel requirements are accounted for in the plan and that there are appropriate plans in place to ensure that those hundreds of people will be available and trained if and when needed.

Response Equipment (RE). As with personnel, substantial work by all parties has gone into ensuring that there will be enough of the right mechanical response equipment available for use during an oil spill cleanup. Equipment availability, types, BAT, maintenance, and more have been scrutinized annually since the first plan was written, scrutiny that is evident in the number of events on the

history timeline that include RE as a relevant topic. Although the BAT regulations are applied to the response system as a whole, the plan holders and their contractors have elected to make significant improvements in specific recovery equipment used as new innovations have come onto the market, particularly in the areas of boom and skimmers.

Realistic Maximum Response Operation Limitations (RMROL). The situations in which a plan holder could not successfully operate mechanical response equipment or escort tugs due to environmental limitations (weather, sea states, etc.) are known as RMROL. Alaska regulations require that plan holders be able to describe RMROL conditions that might be encountered and specify "additional temporary prevention or response measures that will be taken to reduce the environmental consequences of a discharge" during RMROL conditions. [18 AAC 75.425(e)(3)(D)] Defining what these situations are and how a response might be altered to allow oil recovery or a tanker rescue to still occur have been the focus of much debate and study over the life of the plan. Work groups, plan holders, PWSRCAC, and ADEC have repeatedly examined the frequency of RMROL conditions in PWS, what the limitations of different equipment types are, and alternate response options that might be considered.

Sensitive Area Protection (SAP). Alaska regulations require the identification and protection of environmentally sensitive areas and areas of public concern that may be impacted by an RPS-sized spill. [18 AAC 75.425(e)(3)(J)] In PWS, plan holders, stakeholders, and ADEC have worked to identify many of these locations and, where possible, pre-plan for the protection of them. The resulting Geographic Response Strategies (GRS) are maintained by ADEC and are used by the plan holders for SAP planning and training. In some cases, such as at salmon hatcheries, protection equipment has been pre-staged for immediate use. Plan holders have committed to testing sensitive area protection strategies annually, and updates are submitted when appropriate. The timeline contains many instances of work groups, exercises, and amendments which have impacted how SAP is described in the plan.

Scenarios (S). While it is important for the plan holders to have equipment and personnel available to respond to an oil spill, it is equally important for them to have planned for how those resources will be used during a spill so that a response is carried out efficiently and effectively. The scenarios in Section 1 of the plan describe how the plan holders will carry out a response to an RPS-sized spill as well as smaller spills, and are required by the State of Alaska in 18 AAC 75.425(e). Many of the other topics listed here (AL, PN, RE, etc.) focus on information that is located in the scenarios. Additionally, there has been effort put forth by stakeholders, plan holders, and ADEC towards determining what are the right scenarios and what level of information is required by them. Scenarios receive close scrutiny with every plan renewal.

Training (T). The best prevention and response equipment is useless if the people who are operating it don't know how to do so properly. Training of SERVS and contractor personnel and FV crews is continual and is carefully examined to ensure that effective training is being conducted in the correct areas. State regulations in this area are vague, requiring only "a detailed description of the training programs for discharge response personnel [18 AAC 75.425(e)(3)(I)] and written discharge prevention programs that include oil discharge prevention training [18 AAC 75.425(e)(2)(A)]. Under its regulatory discretion, ADEC has generally interpreted these regulations to mean that personnel have to be trained to carry out all prevention and response activities described in the plan. Exercises are conducted to both provide training and to test the capabilities of the responders. Plan holders, stakeholders, and ADEC all participate in or evaluate these exercises and make recommendations for further training.

Wildlife (W). Per Alaska regulations, plan holders are required to include in their scenarios "procedures and methods for the protection, recovery, disposal, rehabilitation, and release of potentially affected wildlife…." [18 AAC 75.425(e)(1)(F)(xi)] and those procedures and methods are subject to the BAT requirements of 18 AAC 75.425(e)(4). In PWS these requirements have led to the development of wildlife response plans, staging of dedicated equipment, construction of an otter rescue center, and designation of wildlife FV task forces.

5. PWSRCAC Comments

PWSRCAC has a responsibility to review contingency plans under its OPA 90 mandate and is one of a few named reviewers in state regulations. The organization has provided comments on every plan renewal and major amendment since 1995. Additionally, PWSRCAC staff and volunteers have engaged in work groups, observed and evaluated drills and exercises, and conducted their own technical analyses of myriad elements of the prevention and response system.

PWSRCAC has submitted hundreds of pages of plan comments. These have ranged from requesting minor edits for clarity to bigger questions, such as whether the escort vessels are sufficiently equipped and crews adequately trained to achieve a challenging save of a laden tanker in bad weather. While PWSRCAC has weighed in on all the key topics identified in the preceding section, and more, some of the key areas of concern expressed since the first renewals in 1995 and 1999 have been:

- Best available technology for all equipment, including a focus on the escort system in more recent years,
- Ensuring that plan holders are prepared to bring equipment in from outside PWS – and to respond to a spill that *leaves* PWS as the *Exxon Valdez* spill did,
- Seeking ongoing assurance that there are sufficient vessels of the necessary types available through the Fishing Vessel program and that personnel numbers and training are adequate,
- Attention to wide-ranging details in the response scenarios, from use of specific equipment to personnel numbers, and
- Ensuring opportunities for public review of referenced documents, e.g., the VERP, with plan reviews.

While some comments may be considered to represent on-going disagreements or discussion, others over the years have become obsolete, such as concerns raised about Y2K computer glitches or details regarding equipment that is no longer used in the system. Many, many PWSRCAC comments were resolved by work groups or simply by text changes in the plan.

PWSRCAC comment documents are listed for reference in the event summaries in the compendium so those seeing further information on any particular event may also trace back to the organization's comments at that time. (Appendix B).

6. Conclusion

It is expected that the processes and issues would evolve over the 25-year life of the tanker plan. In the early years of the plan, there were conditions of approval still being implemented and major decisions being made about the process (e.g., the ruling in 1998 regarding what constitutes "phasing" and what is an acceptable "condition of approval") from the 1995 plan even as the 1998 plan renewal got underway. Two substantive changes to regulations have occurred, both of which can be seen as reducing the requirements for operators. In 1997, ADEC promulgated BAT regulations which deemed any equipment used to meet a response planning standard as BAT. This eliminated any consideration of skimmers and containment systems in future BAT analyses. In 2004, regulations were changed such that plan holders could identify either prevention measures or non-mechanical response options they would use in the event that conditions were not conducive to mechanical recovery. (The regulations are silent on the potential for conditions to preclude non-mechanical options.) The years 1996-2010 saw two significant rounds of workgroup efforts, one of which could be associated with the early plan submittals, 1995 and 1998, while another began with the 2007 renewal. Work groups were used to advance specific issues and ensure all parties were involved in the process. Since 2012, there have been no new work group efforts but multiple amendments initiated by the plan holders.

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Appendix A – Timeline (see separate doc)

Appendix B – Compendium of event summaries (see separate doc)

Appendix C – Conditions of Approval 1995-2020

Approval Year	Renewal or Amendment	COA #	COA Description	Topics	Applicable Alaska Statutes and Regulations	Related Events
1995	R	1	Notify ADEC of any change in contractual relationship with response contractor.	administrative	18 AAC 75.425(e)(3)(H); 18 AAC 75.445(i)	
1995	R	2	Submit vessel escort improvement proposals.	ET		1998 Tanker Escort Improvements
1995	R	3	Submit a report demonstrating effectiveness of the Near Shore Response Plan.	NS	18 AAC 75.425(e)(1)(F)(vi), (vii) and (ix); AS 46.04.030(e); 18 AAC 75.445(g)(2)	1996 Nearshore Response Plan
1995	R	4	Provide supplemental data to PWS air logistics study.	AL	AS 46.040.03(k)(3); 18 AAC 75.438(c)	1996 Supplemental Data for PWS Air Logistics Study and Water Cargo Transportation into Kodiak and Cordova
1995	R	5	Provide a final date for the completion of identification of sensitive areas in PWS, Kodiak, and Kenai Peninsula.	SAP	18 AAC 75.425 (e)(3)(J); 18 AAC 75.445 (d)(4)	1996 ESAs for Prince William Sound, Kodiak, and Kenai Peninsula areas
1995	R	6	Identify primary recreational use areas in PWS, put them in the plan, and create protection procedures for these areas.	SAP	18 AAC 75.425 (e)(3)(J)	1996 Recreational Areas in PWS
1995	R	7	Submit compliance schedule for wildlife handling, complete wildlife training, and complete otter treatment facility construction.	W	18 AAC 75.425(e)(1)(F)(xi) and .445	1996 Wildlife Training and Otter Hospital Compliance Schedule
1995	R	8	Submit oil spill trajectory analysis for two hypothetical spill incidents to determine the forseeable likelihood of	S	6 AAC 80; 18 AAC 785.425 (e)(3)(J); 18 AAC 75.445 (d)(4)	Condition 8 Decision Adjudicatory Hearing request granted and heard with 1995 Plan approval. Condition

			oil reaching the Copper River Delta or Flats.			8 and DEC decision finding trajectory analyses not in compliance with Condition 8 upheld by Deciding Officer. 1999 Copper River Delta Oil Spill Trajectory Analysis and Agreement; 1999 Copper River Delta Oil Spill Trajectory Analysis and Agreement
1995	R	9	Tesoro Alaska Petroleum ONLY: submit amendment to plan which evaluates plan holder response in Kodiak region.	S	18 AAC 75.425 (e)(3)(J); 18 AAC 75.445 (d)(4)	Challenges to Condition 9 were rejected by the Deciding Officer in the 1995 Adjudicatory Hearing Proceedings. Docket No. 700 and Final Decision at p. 9, 12; 1995-1996 Kodiak Island Spill Response
1999	R	1	Notify ADEC of any change in contractual relationship with response contractor.	administrative	18 AAC 75.425(e)(3)(H); 18 AAC 75.445(i)	The Shippers filed an adjudicatory hearing request that was subsequently dismissed after discussions with DEC. Tom Lakosh filed an adjudicatoryhearing request that was denied for not meeting the adjudicatory hearing requirements. administrativestrative Law Judge Shelley Higgins heard the case which was affirmed by Superior Court Judge Dan Hensley.
1999	R	2	Deadline established for 2002 renewal, and scope of future renewal outlined.	administrative	AS 46.04.030(e); AS 46.04.030(d); 18 AAC 75.415; 18 AAC 75.420	John Kotula wrote a letter on behalf of the ADEC concerning the upcoming 2002 renewal.
1999	R	3	Participate in GRS workgroup, update plan, and deploy GRS equipment.	SAP	AS 46.04.030(e); 18 AAC 75.445(d)(4); 18 AAC 75.425(e)(3)(J); 18 AAC 75.425(e)(1)(F); 18 AAC	2000 Geographic Response Strategy

					75.425(e)(1)(F)(v); 18 AAC 75.415	
1999	R	4	Participate in scenario workgroup.	S	AS 46.04.03 (e); 18 AAC 75.425 (e)(1)(F); 18 AAC 75.445(d)(3); 18 AAC 75.445(d)(4); 18 AAC 75.445 (d)(5)	2000 Scenario Workgroup
1999	R	5	Provide for access to secondary storages barges.	B	AS 46.04.030 (e); AS 46.04.030(k)(3)(C)	2000 Minor Amendment re Nearshore Secondary Storage Barges
1999	R	6	Modify and update spill response training for fishing vessel response.	FV, TR	AS 46.04.030 (e); AS 46.04.030(k)(3)(C); 18 AAC 75.430 – 18 AAC 75.442; 18 AAC 75.445(d)(4)	2000 Major Amendment re Fishing Vessel Program
1999	R	7	Provide respirator training to 18 Tier I fishing vessels.	FV, TR	AS 46.04.030(e); AS 46.04.030(k)(3); 18 AAC 75.445(j)	2000 Minor Amendment re Respirator Training
1999	R	8	Conduct simulation and sea trials for Hinchinbrook Entrance tanker escort opeerations.	ET	AS 46.04.030 (e); 18 AAC 75.027(e); 18 AAC 75.425(e)(2)(D); 18 AAC 75.425(e)(4)(A)(iii); 18 AAC 75.425(e)(3)(D); 18 AAC 75.445 (f)	2001 Major Amendment re Hichinbrook Entrance tug
1999	R	9	Submit a report if a vessel is involved in a reportable incident along the TAPS trade route.	administrative	AS 46.04.030 (e); 18 AAC 75.005	2000 Notification of Vessel Casualty
1999	R	10	Submit conforming plan edits within 45 days.	administrative	AS 46.04.030(e)	
2000	A		No COA were written into the major amendment approval.			

2001	A		No COA were written into the major amendment approval.			
2002	R		No COA were written into the 2002 plan renewal.			
2004	A	1	Demonstrate the ITB Krystal Sea's response capabilities and adequate staffing with trained crew members.	RE, TR	18 AAC 75.425(e)(3)(F)	
2004	A	2	Confirm the ITB's availability and procedures for addressing circumstances when it would not be available.	RE, TR	18 AAC 75.425(e)(3)(F)	
2004	A	3	Agree to the requirement that the Krystal Sea remain in the region of operation in order to meet RPS requirements.	RE, TR	18 AAC 75.425(e)(3)(F)	
2006	A	1	Assignment of one additional fishing vessel to any Near Shore Task Force which incorporated a Current Buster system, and notification to ADEC before any changes are made	NS, TR, FV, RE	18 AAC 75.425(e)(3)(F)	
2006	A	2	Fishing vessel crew training in all near shore tactics	NS, TR, FV, RE	18 AAC 75.425(e)(3)(F)	
2006	A	3	A requirement that eight Current Buster systems would be available for deployment before the amendment could become effective	NS, TR, FV, RE	18 AAC 75.425(e)(3)(F)	
2007	R	1	Initiate a workgroup to verify personal numbers, roles, and deployment strategies.	P	18 AAC 75.425 (e)(3)(C) and (I)	2008 Personnel Workgroup

2007	R	2	Conduct a field exercise to verify aerial support for dispersant use.	AL, NM	18 AAC 75.425 (e)(3)(G) and 425 (e)(3)(G)	2008 Dispersant Aerial Support Workgroup
2007	R	3	Provide documents verifying the updated plan information for the Tier III fishing vessel program.	FV, TR	AS 46.04.030(e); 18 AAC 75.425(e)(3)(I)	
2007	R	4	Keep up current Nearshore Task Force 5 equipment and update plan when new equipment arrives.	NS	18 AAC 75.425(e)(3)(F)	
2007	R	5	A copy of the approved plan must be on board covered vessels at all times.	administrative	18 AAC 75.465	
2007	R	6	Submit a final revised copy of the plan within 30 days.	administrative	AS 46.04.030(e)	
2007	R	7	Future amendments must be submitted in "red line" format identifying all changes.	administrative	AS 46.04.030(e); 18 AAC 75.415; 18 AAC 75.420	
2007	R	8	Notify ADEC of any change in contractual relationship with response contractor.	administrative	18 AAC 75.425(e)(3)(H); 18 AAC 75.445(i)	
2012	R	1	A copy of the approved plan and COA must be on board all vessels in state waters	administrative	18 AAC 75.465	
2012	R	2	Submit updated plan within 30 days.	administrative	AS 46.04.030(e)	
2012	R	3	Future amendments must be submitted in "red line" format identifying all changes.	administrative	AS 46.04.030(e); 18 AAC 75.415; 18 AAC 75.420	
2012	R	4	Notify ADEC of any change in contractual relationship with response contractor.	administrative	18 AAC 75.425(e)(3)(H); 18 AAC 75.445(i)	
2012	R	5	Correct section on fishing vessel availability to show correct numbers.	administrative	AS 46.04.030(e); AS 46.04.030(k); 18 AAC 75.438; 18 AAC	

					75.425(e)(1)(F); 18 AAC 75.445(c)	
2012	R	6	Provide documents to verify information on Tier III fishing vessel program.	FV, TR	AS 46.04.030(e); 18 AAC 75.425(e)(3)(I)	
2017	R	1	Submit administrativeistrative corrections to plan.	administrative	AS 46.04.030(e)	
2017	R	2	Provide documents to verify information on Tier I, II, III fishing vessel programs.	FV, TR	AS 46.04.030(e); 18 AAC 75.425(e)(3)(I)	
2017	R	3	Notify ADEC of any change in contractual relationship with response contractor.	administrative	18 AAC 75.425(e)(3)(H); 18 AAC 75.445(i)	
2018	A	1	Requirement to make seven administrativeistrative edits and factual corrections prior to publication.	ET, TR, FV	18 AAC 75.425 (e)(3)(G) and 425 (e)(3)(G); 18 AAC 75.425(e)(3)(F)	
2018	A	2	PWS Transition Plan changes and implementation, including: a. Updates to training information, b. Adding an appendix to the Transition Plan which maintained the TransRec tactics until all TransRec skimmers were decommissioned, c. Inclusion of the Transition Plan as an appendix to the ODPCP until transition was complete, and d. Additional demonstrations and documentation to assure vessel configuration and crew training.	ET, TR, FV	19 AAC 75.425 (e)(3)(G) and 425 (e)(3)(G); 18 AAC 75.425(e)(3)(F)	

2018	A	3	Submittal of additional documentation, including ABS and USCG documentation and load and decant plans for the Mineral Creek and OSRBs.	ET, TR, FV	20 AAC 75.425 (e)(3)(G) and 425 (e)(3)(G); 18 AAC 75.425(e)(3)(F)	
2018	A	4	Update of PWS Tanker C-plans information regarding escort and sentinel tugs, as well as the response training program	ET, TR, FV	21 AAC 75.425 (e)(3)(G) and 425 (e)(3)(G); 18 AAC 75.425(e)(3)(F)	
2018	A	5	Additional exercise requirements which included a tabletop exercise for additional personnel needed to meet the 18-hour commitment, a lightering barge exercise, and field demonstrations of open water recovery operations.	ET, TR, FV	22 AAC 75.425 (e)(3)(G) and 425 (e)(3)(G); 18 AAC 75.425(e)(3)(F)	
2018	A	6	Requirement to provide quarterly reports for crew training and exercises.	ET, TR, FV	23 AAC 75.425 (e)(3)(G) and 425 (e)(3)(G); 18 AAC 75.425(e)(3)(F)	
2020	A		No COA were written into the major amendment approval.			

Appendix D – Findings 1995-2020

Renewal Year	Finding #	Finding Description	Topics	Applicable Alaska Statutes and Regulations
1995	1	The core plan adequately describes fire hazard prevention and control methods. There is no legal basis to require demonstration of plan holder's fire-fighting capabilities for an oil spill that is on fire. Attorney General opinion is included.	RE	18 AAC 75.425(e)(1)(F)(ii); 18 AAC 75.425(e)
1995	2	There is not sufficient information to find that the tanker escort is BAT, particularly for VLCCs; vessel escort improvement proposal required. Findings document	ET, BAT	AS 46.04.030(e); 18 AAC 75.990(5); 18 AAC 75.445(f)

		discusses the need for regulatory guidance on BAT, which had not yet been promulgated. It also explains the use of a "system" approach to considering BAT for the escort system, which is applied to this day. Finally, it acknowledges the then-forthcoming PWS risk assessment as providing necessary information regarding the escort system and prevention measures overall. [See 1995 COA 2.]		
1995	3	The open-water response system is BAT, but there is not sufficient information yet to determine that the nearshore response system is BAT. [See 1995 COA 3.]	BAT, RE	AS 46.04.030(e); 18 AAC 75.445(g)(2); 18 AAC 75.990(5)
1995	4	Overall the scenarios (three at the time) satisfy the requirement to describe deployment strategies for various response system elements, but more information is needed to assess air transportation during holiday periods as well as water transprtation to Kodiak and Cordova. [See COA 4.]	RE, AL	AS 46.04030(k); 18 AAC 75.438; 18 AAC 75.424(e)(1)(F); 18 AAC 75.445(c); 18 AAC 75.438
1995	5	Tesoro Alaska Petroleum must submit response plan for Kodiak region.	S	AS 46.04.030(r); AS 46.04.030(c); AS 46.03.030(k)(3); AS 46.04.900(23); 18 AAC 75.495; AS 46.04.020(g)(1)&(2)
1995	6	Plans provide adequate equipment to support lightering oil from a tanker vessel.	L	18 AAC 75.425(e)(3)(F)
1995	7	The necessary contracts are in place between plan holders and the Primary Response Action Contractor. The equipment required to meet the in-region response planning standard must be listed in plan.	C	AS 46.04.035(h)(2); 18 AAC 75.500(a)&(b)
1995	8	Insufficient information to determine full adequacy of nearshore response, plan holders must complete several tasks. [See COA 3.]	NS	18 AAC 75.425(e)(1)(F),(vi), and (ix)
1995	9	Sufficient controls exist to prevent required response equipment from being removed from a spill response when spill leadership transitions from APSC to the Responsible Party [under AS 46.020(g)(2)].	RE	AS 46.04.030(r); AS 46.020(g)(2)
1995	10	Current vessels operating in the TAPS trade meet requirements for a towing system.	ET	18 AAC 75.027(f)
1995	11	Plan holders must provide a compliance schedule for identifying environmentally sensitive areas, as well as recreational use areas. [See COA 5 and 6.]	SAP	18 AAC 75.425; 18 AAC 75.445; 18 AAC 75.425(e)(3)(J)
1995	12	ADEC should require completion of wildlife recovery/rehabilitation infrastructure as a COA. [See COA 7.]	W, TR	18 AAC 75.425(e)(1)(F)(xi); 18 AAC 75.445
1995	13	Adequate strategy for a 2000 bbl and less spill at the VMT.	RE	18 AAC 75..425(e)(1)(F)
1995	14	Dispersant Corexit 9527 may be considered by the FOSC in a spill response.	NM	18 AAC 75.445(h)
1995	15	Core plan contains an RMROL analysis of the environmental and operation conditions that would impede or hamper a response.	RMROL	18 AAC 75.425(e)(3)(D); 18 AAC 75.445(f)

1995	16	Respose to Comments Not Related to a Major Finding: Onshore Response Equipment, Medical Monitoring and Substance Abuse Programs, Fishing Vessel Response Training, Availability of Escort Vessels During a Response	TR	
1999	1	GRSs are required to continually improve the plan and incorporate new information	SAP	18 AAC 75.425(e)(3)(J); 18 AAC 75.425(e)(1)(F)(v); 18 AAC 75.438; 18 AAC 75.445(d)(4)
1999	2	Plan holders have not sufficiently demonstrated that they maintain access to an additional barge to provide secondary storage	B	18 AAC 75.425(e); 18 AAC 75.445; AS 46.04.030(k)(3)(C)
1999	3	There is an adequate number of trained fishing vessels, but Tier III vessels must be trained to be viable response assets.	FV, TR	AS 46.04.030(k); AS 46.04.030(k)(3)(C); 18 AAC 75.425(e)(3)(F); 18 AAC 75.445(g)(4)
1999	4	Respirator training is required to prepare the Tier I fishing vessel fleet to work in fresh oil.	FV, TR	18 AAC 75.425(e)(1)(C); 18 AAC 75.445
1999	5	Plan holders need to update and modify worst case spill scenario to meet the intent of ADEC regulations.	S	18 AAC 75.425(e)(1)(F); 18 AAC 75.445(d)
1999	6	Simulations of tug performance during worst case events must be developed.	ET	18 AAC 75.425(e)(4); 18 AAC 75.445(k)
2002	1	All plan holders have adequate access to sufficient out-of-region response equipment through a registered PRAC; ADEC verified this by requiring an Out of Region Acquisition Survey from each plan holder during the plan review.	RE	AS 46.04.030(k); 18 AAC 75.430; 18 AAC 75.438
2002	2	1999 scenario workgroup provides full activation of entire range of adopted spill response strategies, usable for any size spill.	S	18 AAC 75.425(e)(1)(F); 18 AAC 75.445(c) & (d)
2002	3	Sufficient resources are available to support the levels of nearshore response operations listed in the plan	NS	18 AAC 75.425(e)(1)(F); 18 AAC 75.445(d)
2002	4	Plan holders have access to adequate numbers of personnel trained in ICS, and can properly and efficiently staff a response.	PN	18 AAC 75.425(e)(3)(C)
2002	5	TAPS trade vessel inspections by the USCG are adequate to establish compliance with state regulations.	C	18 AAC 75.007(h); 18 AAC 75.005 - 18 AAC 75.090; 18 AAC 75.007(b); 18 AAC 75.425(e)(2)(A)
2002	6	Towlines onboard escort vessels are adequate for the intended purpose and services (and are BAT).	ET	18 AAC 75.027; 18 AAC 75.425(e)(4)(A)(iii)
2002	7	Plan holders have adequately addressed BAT requirements, including escort system.	BAT, ET	18 AAC 75.425(e)(4); 18 AAC 75.445(k)
2007	1	The plan meets intent of regulations by providing adequate information about the deployment of shoreline cleanup.	RE	18 AAC 75.425(e)(1)(F)(xii); 18 AAC 75.438(a)(1)

2007	2	The plan contains adequate information to address the protection of downstream communities and sensitive areas.	SAP	18 AAC 75.310(a)
2007	3	The plan contains sufficient information to ensure that responses in darkness can be carried out.	NS	18 AAC 75.425(e)(1)(F)
2007	4	Ariel response resources identified in the plan are sufficient to meet initial response requirements.	AL	18 AAC 75.425 (e)(3)(E); 18 AAC 75.445(d)(3)
2007	5	The plan sufficiently identifies the required number of trained personnel needed to fill the positions necessary in first 72 hrs of a response.	PN	18 AAC 75.445(c); 18 AAC 75.430 - 18 AAC 75.442
2007	6	Non-technical monitoring of dispersants and in-situ burning is adequately described in the plan.	NM	18 AAC 75.425 (e)(3)(G)(i)
2007	7	The plan adequately described RMROL capabilities during a situation when response would be impaired or ineffective (I.e. severe weather).	RMROL	18 AAC 75.425(e)(3)(D)
2007	8	The plan contains sufficient response capacities for the specific purpose of protecting sensitive areas.	SAP	18 AAC 75.425(e)(3)(J); 18 AAC 75.425(e)(1)(F)(v); 18 AAC 75.445(d)(4)
2007	9	The BAT information contained in the plan meets regulatory requirements.	BAT	18 AAC 75.425(e)(4)(A)(iii); 18 AAC 75.445(k)(3)(A) through (H), 18 AAC 75.027(e)
2007	10	The plan adequately describes and accounts for resources necessary to care for wildlife during an oil spill response.	W	18 AAC 75.425(c)(1)(F)(xi)
2007	11	The quantity and types of boom identified in the plan are sufficient to satisfy regulatory requirements.	RE	18 AAC 75.425(g)(3); 18 AAC 75.438
2012	1	Sensitive area protection task forces are sufficiently equipped with fishing vessels.	SAP	18 AAC 75.425(e)(3)(J); 18 AAC 75.425(e)(1)(F)(v); 18 AAC 75.445(d)(4)
2012	2	Nearshore response systems have been/will be sufficiently field tested.	NS	18 AAC 75.425(e)(1)(F)
2012	3	There are sufficient on-site safety officers and supporting fishing vessels designated in the plan.	PN, FV	18 AAC 75.425(e)(1)(C)
2012	4	Plan holders have a system in place to ensure fishing vessels are equipped with enough trained crew.	FV, PN	18 AAC 75.445(c); 18 AAC 75.430 - 18 AAC 75.442; 18 AAC 75.438
2012	5	The plan has been adjusted to sufficiently identify the required personnel to carry out a response.	PN	18 AAC 75.445(c); 18 AAC 75.430 - 18 AAC 75.442; 18 AAC 75.438
2012	6	Concerns raised about the plan with regards to weather/sea state and booming are adequately met.	RMROL	AS 46.03.030(k)(3); 18 AAC 75.438; 18 AAC 75.425(e)(1)(F); 18 AAC 57.445(d)(5); 18 AAC 75.425(e)(3)(D); 18 AAC 75.445(f)
2012	7	A vessel decontamination task force is contained in the current plan and would sufficiently decrease hull contamination.	RE, FV	18 AAC 75.438; 18 AAC 75.425

2012	8	The 546 Scenario meets regulatory requirements for lightering.	L	18 AAC 75.027(a); 18 AAC 75.425(e)(1)(F)(viii); 18 AAC 75.438; 18 AAC 75.425(e)(1)(F)(ix)
2012	9	BAT analysis In the 2012 plan is sufficient.	BAT	18 AAC 75.425(e)(4)(A)(i) and (iii); 18 AAC 75.445(k)(3)(A) through (H); 18 AAC 75.027(e); 18 AAC 75.445(k)(2)
2012	10	The roles listed in the plan incident management team organization chart are sufficient to meet initial response needs.	PN	18 AAC 75.425(e)(3)(C)
2012	11	Eight areas were identified as needing verification through response exercises.	TR	18 AAC 75.485
2017	1	The incorporation of the crucial skimmers and buster booming systems into the plan was approved.	RE	18 AAC 75.445(g); 18 AAC 75.430 - 18 AAC 75.442; 18 AAC 75.445(k)(1)
2017	2	The removal of one open water recovery barge did not impede the plan's effectiveness.	B	46.04.030(k)(3)(B); 18 AAC 75.438
2017	3	Concerns about the barge and vessel system expressed through public comments are unfounded.	B, ET	18 AAC 75.445; 18 AAC 75.425
2017	4	The plan has sufficient lightering capabilities.	L	18 AAC 75.027; 18 AAC 75.445(d)(6)
2017	5	Regulations do not require that plan holders demonstrate their abilities under all possible environmental conditions.	RMROL	18 AAC 75.990(101); 18 AAC 75.425(e)(3)(D); 18 AAC 75.445(f)
2017	6	Concerns about decanting are unfounded.	RE, S	18 AAC 75.445(d)(7); AS 46.03.050; AS 46.04.020(b)
2017	7	Descriptions of monitoring plans for non-mechanical response are adequate and meet regulations.	NM	18 AAC 75.425(e)(3)(G)(i); 18 AAC 75.445(h)
2017	8	The referenced terminology regarding ANS crude characteristics is acceptable, but ADEC will continue to analyze oil periodically and update terminology, if needed.	OP	18 AAC 75.445(g)(5); 46.04.900(12)
2017	9	The plan holders have a system in place to ensure fishing vessels are equipped with sufficient trained crew.	FV, TR	18 AAC 75.445(c); 18 AAC 75.438
2017	10	The information listed in the plan is sufficient for addressing debris encountered during a response.	RE	18 AAC 75.445(d)(7); 18 AAC 75.425(e)(1)(F)
2017	11	The three sensitive area task forces and associated equipment are sufficient for sensitive area protection.	SAP	18 AAC 75.425(e)(3)(J); 18 AAC 75.425(e)(3)(J)(iii); 18 AAC 75.425(e)(1)(F)(v); 18 AAC 75.445(d)(4)
2017	12	BAT analyses contained in the core plan continue to meet regulatory requirements.	BAT	18 AAC 75.425(e)(4)(A)(i) and (iii); 18 AAC 75.425(e)(1)(F)(iv); 18 AAC 75.445(k)(3)(A) through (H); 18 AAC 75.990(130); 18 AAC 75.027(e); 18 AAC 75.445(g)(2); 18 AAC

				75.990(9); 18 AAC 75.445(k)(1); 18 AAC 75.445(k)(2)
2017	13	The three weather scenarios contained in the plan are sufficient to address winter weather conditions.	S	18 AAC 75.425(e)(1)(F)
2017	14	The core plan sufficiently identifies the personnel to carry out a response.	PN	18 AAC 75.445(c); 18 AAC 75.438; 18 AAC 75.425(e)(3)(C)
2017	15	While plan holders must demonstrate the ability to develop a safety plan, ADEC regulations do not specify what the plan must contain.	S	18 AAC 75.425(e)(1)(C)
2017	16	The current plan is sufficient for a response in darkness, but ADEC will continue to ensure that training focuses on operation in darkness.	TR	18 AAC 75.425(e)(1)(F)

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PRINCE WILLIAM SOUND TANKER OIL SPILL PREVENTION & CONTINGENCY PLAN

Compendium of Event Summaries (1995-2020)

Prepared for Prince William Sound Regional Citizens' Advisory Council

August 2021 DRAFT

Table of Contents

Abbreviations

ADEC	Alaska Department of Environmental Conservation
Alyeska	Alyeska Pipeline Service Company
BAT	Best available technology
COA	Condition of Approval (issued by ADEC in C-plan review process)
ERV	Emergency Response Vessel
ETT	Enhanced Tractor Tugs
HE	Hinchinbrook Entrance
ODPCP	Oil Discharge Prevention and Contingency Plan
OPA90	Oil Pollution Act of 1990
PRT	Prevention and Response Tug
PWS	Prince William Sound
PWSRCAC	Prince William Sound Regional Citizens' Advisory Council
RFAI	Request for Additional Information
RFP	Request for Proposal
RMROL	Realistic maximum response operating limitations
RPG	Response Planning Group (representing the PWS C-Plan holders)
SERVS	Alyeska Pipeline Service Company's Ship Escort/Response Vessel System
Tanker C-plan	Prince William Sound Crude Oil Tanker Oil Discharge Prevention and Contingency Plan
VERP	Vessel Escort and Response Plan
VSP	Voith Schneider Propulsion
USCG	U.S. Coast Guard

1995 Plan Approval

Plan holders:
ARCO Marine, Inc.; Atlantis Agency Corporation; Cambridge Tankers, Inc.; Chevron Shipping Company; First Shipmour Associates; Fourth Shipmour Associates; Intercontinental Bulktank Corporation; Interocean Management Corporation; Interocean Tanker Corporation; Juneau Tanker Corporation; Marine Transport Lines, Inc.; OMI, Inc.; Overseas Bulktank Corporation; First United Shipping Corporation; SeaRiver Maritime; Second Shipmour Associates, Inc.; Second United Shipping Corporation; Keystone Shipping; Third Shipmour Associates, Inc.; Third United Shipping Corporation; and Tesoro Alaska Petroleum Company.

Summary:
The first Tanker C-plan approval after a full review under the post-EVOS contingency plan statute (AS 46.04.030 enacted with HB 567, 1990) and the 1992 "HB 567 regulations" (18 AAC 75.005 - .090 and 75.400 - .495) was completed in 1995. In approving the plan, ADEC issued 15 findings and 9 conditions of approval (COA). At this time, the Prince William Sound Core Plan consisted of Notebooks A - G consisting of Part 1 – Response Action Plan, Part 2 – Prevention Plan (Parts 1 and 2 totaled 183 pages), and Part 3 Supplemental Information Documents (Part 3 totaled 2,937 pages).

In March 1994, the plans were formally submitted as contingency plan amendment applications under the new HB 567 regulations. After a series of additional information requests, including a large additional information request form the PWSRCAC in June 1994, ADEC declared the plans complete for review in February 1995 and requested comments from all review participants.

To assist the public in making comments, ADEC, in March 1995, issued a two-volume set of draft findings. One set of findings concerned the individual tanker plans and the other concerned the PWS "core plan" relied on by all the PWS plan holders. ADEC then held public hearings in Kodiak, Homer, Valdez, Cordova, and Anchorage. In August 1995, ADEC issued its final findings and responses to public comments and issued a proposed consistency determination under the Alaska Coastal Management Program (ACMP).

In August 1995, the Kodiak Island Borough filed an ACMP elevation request seeking a specific protection plan for the Kitoi Bay Hatchery in the contingency plans. The City of Cordova also filed an ACMP elevation request seeking a condition of approval requiring a specific protection plan for the Copper River Delta and Flats.

In September 1995, the Resource Agency Directors issued a decision on the ACMP elevation requests by the City of Cordova and the Kodiak Island Borough. As a result, COA 8 was added to the contingency plan approvals requiring oil spill trajectory analyses to determine the likelihood of oil reaching the Copper River Delta and Flats and, if established, requiring

planning of effective spill response strategies for that region. In addition, COA 9 was added to the Tesoro Alaska Petroleum contingency plan approval requiring a plan amendment evaluating the plan holder's capability to respond to a spill that might occur within Kodiak region of operation waters, or that might occur outside of these waters but migrate so as to impact the Kodiak region of operation.

In September 1995, SeaRiver Maritime, BP Oil, the City of Cordova, and the Kodiak Island Borough challenged COAs 8 and 9 of the plan approval by elevating the Director's level ACMP decision to the Commissioners of ADEC, ADNR, and ADFG. On September 27, 1995, ADEC Commissioner Gene Burden, on behalf of all of the state resource agency commissioners, issued a final consistency determination under the ACMP for ADEC's contingency plan approvals including conditions 8 and 9.

In October 1995, ADEC delivered plan approval letters to the twenty-one shippers, including eight COAs for the Prince William Sound plan holders and nine COAs in the case of Tesoro Alaska Petroleum. In November, the plan approval was challenged by several parties who requested adjudicatory hearings: Tom Copeland, Tom Lakosh, Kristin Stahl-Johnson, Cordova District Fishermen United and United Fisherman for Alaska (CDFU/UFA), BP Oil Shipping Co., SeaRiver Maritime, Inc., the City of Cordova, and the Kodiak Island Borough.

Former ADEC Commissioner Gene Burden granted adjudicatory hearing requests brought by Tom Copeland, Tom Lakosh, Kristin Stahl-Johnson, CDFU/UFA, BP Oil Shipping Co., and SeaRiver Maritime, Inc. Commissioner Burden also granted adjudicatory requests brought by the City of Cordova and Kodiak Island Borough which were subsequently withdrawn in 1995. Eight subsequent adjudicatory hearing requests were filed by the CDFU parties and granted by Commissioner Michele Brown concerning actions by ADEC on the plan holders' submittals in response to the COA placed on the 1995 contingency plan approvals. These challenges to ADEC's actions on the conditions of approval were consolidated with the 1995 contingency plan adjudication (discussed in a separate summary in this report).

Concurrent with the plan renewal, the shippers had initiated a Prince William Sound risk assessment with input and funding from PWSRCAC.

Supporting Documents:

ADEC. (1995, August) Prince William Sound Oil Tanker Contingency Plan Review: Findings Document and Response to Comments.
651.410.950801.pdf

Alaska Department of Law. (1997) Appendix A: A Brief History of Oil Discharge Prevention and Contingency Planning Since the Exxon Valdez Oil Spill, Opposition to Petition for Review, CDFU et. al. v. Alaska Department of Environmental Conservation.
S07987

APSC. (1997) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan (Notebooks A-G).

Burden, G. (1995, September 27) Gene Burden, ADEC Commissioner, to Hersh Kohut, Arco Marine, Inc., re: Commissioner Level Consistency Determination for Marine Oil Spill Response Plan Oil Discharge Prevention and Contingency Plan, Dated March 25, 1994 – Final Action, September 27, 1995.
651.300.950907DECdftappvl.pdf

Chapple, T. (1995, March 29) Tom Chapple, ADEC, to Bill Walker, PWS Regional Citizens' Advisory Council, re: Prince William Sound Tanker Contingency Plan, Draft Findings, March 29, 1995.
651.300.950329.ADECdftFnds.pdf

Chapple, T. (1995, August 11) Tom Chapple, ADEC, to H.E. Stanley, re: Proposed Decision packet for Prince William Sound Tanker Contingency Plans, August 11, 1995.
651.300.950811.ADEC prpsdCpln.pdf

Chapple, T. (1995, October 2) Tom Chapple, ADEC, to Mark Necessary, Tesoro Alaska Petroleum, Inc., re: Approval Letter, October 2, 1995. (This letter was the same as that provided to the other plan holders, with the addition of a ninth condition of approval requiring information about Tesoro's ability to respond to a spill in the Kodiak region of operation.)
651.300.951003.DECplnAppvl.pdf

Fredriksson, K. (1995, September 7) Kurt Fredriksson, ADEC, to Mark Necessary, Tesoro Petroleum Company, re: Proposed Director Level Consistency Determination for Vessel Operations Oil Discharge and Contingency Plan dated June 15, 1994, September 7, 1995.
651.300.950907DECdftappvl.pdf

PWSRCAC Comments:

Date	Communication	Contents	Doc Management
June 1994	Letter to ADEC	Round 1 RFAI (209 pp)	651.431.940623.Cmts&RFAITkrPlan.pdf
April 1995	Public Summary	Major Issues on PWS ODPCP and ADEC Draft Findings Document (45 pp)	651.431.950426.RCACtkrCPissues.pdf
May 1995	Letter to ADEC	PWS ODPCP and ADEC Draft Findings Document (52 pp)	651.105.950519.TkrDraftADEC.pdf
May 1995	Letter to ADEC	PWS ODPCP and ADEC Draft Findings Document (vol. 2) (158 pp)	651.105.950531.TNKcplanCmnt.pdf
June 1995	Letter to Atlantis Agency Corporation	PWS ODPCP and ADEC Draft Findings (24 pp)	651.105.950605.TkrCPInCmnts.pdf
August 1996	Letter to ADEC	RPG Copper River Submittal (3 pp)	651.105.960830.RPGCopperRiv.pdf

1996 Near Shore Response Plan (1995 COA 3)

Plan holders:
ARCO Marine, Inc.; Atlantis Agency Corporation; Cambridge Tankers, Inc.; Chevron Shipping Company; First Shipmour Associates; Fourth Shipmour Associates; Intercontinental Bulktank Corporation; Interocean Management Corporation; Interocean Tanker Corporation; Juneau Tanker Corporation; Marine Transport Lines, Inc.; OMI, Inc.; Overseas Bulktank Corporation; First United Shipping Corporation; SeaRiver Maritime; Second Shipmour Associates, Inc.; Second United Shipping Corporation; Keystone Shipping; Third Shipmour Associates, Inc.; Third United Shipping Corporation; and Tesoro Alaska Petroleum Company.

Summary:
In the 1995 plan approval, ADEC required in COA 3 a report demonstrating that the Near Shore Response Plan met four specific criteria in order to evaluate the effective use of near shore skimmers, the range of travel of mini-barges which serve response vessels/skimmers, and turn-around times for minibarges after they lighter to Barge 500-2.

On December 14, 1995, the Response Planning Group submitted an analysis to comply with Condition 3. The information was sent out for public review and comments were received from CDFU, Tom Lakosh, and PWSRCAC.

On September 20, 1996, ADEC issued a decision letter and required that the plan holders contract through SERVS with an additional 53 fishing vessels to provide for the in-region task forces' timely arrival at the scene of a discharge incident. ADEC required plan holders to make available an additional barge for lightering oil and water collected by the near shore task forces to allow for operations in more than one geographic area. The decision was affirmed in the 1998 adjudicatory hearing.

Supporting Documents:

ADEC. (1995, August) Prince William Sound Oil Tanker Contingency Plan Review: Findings Document and Response to Comments. (950814 PWS Tanker Plan Final Findings).
651.410.950801.pdf

Chapple, T. (1995, October 2) Tom Chapple to Hersh Kohut, Arco Marine, Inc., October 2, 1995 [Approval Letter].
651.300.951003.DECplnAppvl.pdf

Yates, H.W. (1995, December 14) H.W. Yates, SeaRiver Maritime, on behalf of RPG, to Tom Chapple, ADEC, re: PWSODP&CP, ADEC Final Approval Condition No. 3.
657.300.951214.SeaRNearshor.pdf

Chapple, T. (1996, Sept 20) Tom Chapple, ADEC to Hersch Kohut, ARCO Marine, Inc., Decision Regarding Condition 3 of Prince William Sound Contingency Plan Approval.

651.300.960920.ADECCond3PWS.pdf

Lisiecki, S. (1997, January 13) Simon Lisiecki, BP Oil Company, on behalf of the RPG, to Tom Chapple, ADEC, re: Follow-up to ADEC's Decision regarding Condition 3 of the Prince William Sound Tanker Contingency Plan Approval.
651.300.970113.BPtkrCond3.pdf

Provant, S. (1997, May 27) Steve Provant, ADEC, to Simon Lisiecki, BP Oil Company, on behalf of the RPG, re: Response Planning Group Letter of January 13, 1997, concerning contingency plan approval condition #3.
651.300.970527.CPlanAppCon3.pdf

SERVS (1997, August 25) Fishing Vessel Program.
703.410.970825.SERVSstatus

Johnson, R. (1998, August 14) Adjudication of Prince William Sound Oil Tanker Contingency Plans Approved October 2, 1995, and Consolidated Matters, Final Decision by Deciding Officer 1995 PWS Tanker C-plans and Consolidated Matters Final Decision by Deciding Officer August 1998.pdf

1996 ESAs for Prince William Sound, Kodiak, and Kenai Peninsula areas (1995 COA 5)

Plan holders:
ARCO Marine, Inc.; Atlantis Agency Corporation; Cambridge Tankers, Inc.; Chevron Shipping Company; First Shipmour Associates; Fourth Shipmour Associates; Intercontinental Bulktank Corporation; Interocean Management Corporation; Interocean Tanker Corporation; Juneau Tanker Corporation; Marine Transport Lines, Inc.; OMI, Inc.; Overseas Bulktank Corporation; First United Shipping Corporation; SeaRiver Maritime; Second Shipmour Associates, Inc.; Second United Shipping Corporation; Keystone Shipping; Third Shipmour Associates, Inc.; Third United Shipping Corporation; and Tesoro Alaska Petroleum Company.

Summary:
In its approval of the 1995 plan, ADEC required in COA 5 identification of a final date for the completion of the identification of sensitive areas and areas of public concern for the Prince William Sound, Kodiak, and Kenai Peninsula areas.

In November 1995, the RPG, through SERVS and their contractor EMCON Alaska, provided ADEC with an updated Geographical Resource Database (GRD) which include data on sensitive areas and areas of public concern transmitted from local, state, and federal resource agencies. The updated GRD included additional data on sensitive areas and areas of public concern for PWS, Kenai Peninsula, and Kodiak Island.

After consultation with Alaska Department of Fish and Game, ADEC verified the accuracy of the data included in the updated GRD and in a letter dated August 1, 1996, they determined that the requirements of 1995 COA 5 had been satisfied.

Supporting documents:

ADEC. (1995, August) Prince William Sound Oil Tanker Contingency Plan Review: Findings Document and Response to Comments. (950814 PWS Tanker Plan Final Findings).
651.410.950801.pdf

Chapple, T. (1995, October 2) Tom Chapple to Hersh Kohut, Arco Marine, Inc., October 2, 1995 [Approval Letter].
651.300.951003.DECplnAppvl.pdf

Chapple, T. (1996, August 1) Tom Chapple to Hersh Kohut, Arco Marine, Inc., Status "Conditions of Approval" for Prince William Sound Tankers Oil Discharge Prevention and Contingency Plan
651.300.960801.PWStkrODPCP

1996 Supplemental Data for PWS Air Logistics Study and Water Cargo Transportation into Kodiak and Cordova (1995 COA 4)

Plan holders:
ARCO Marine, Inc.; Atlantis Agency Corporation; Cambridge Tankers, Inc.; Chevron Shipping Company; First Shipmour Associates;
Fourth Shipmour Associates;Intercontinental Bulktank Corporation; Interocean Management Corporation; Interocean Tanker Corporation; Juneau Tanker Corporation; Marine Transport Lines, Inc.; OMI, Inc.; Overseas Bulktank Corporation; First United Shipping Corporation; SeaRiver Maritime; Second Shipmour Associates, Inc.; Second United Shipping Corporation; Keystone Shipping; Third Shipmour Associates, Inc.; Third United Shipping Corporation; and Tesoro Alaska Petroleum Company.

Summary:
Condition of approval 4 of the 1995 plan renewal required the plan holders to provide supplemental data to the PWS Air Logistics Study that assessed air cargo transportation availability during peak holiday seasons and water cargo transportation into Kodiak and Cordova, both direct from the Lower 48 and from the Alaska mainland.

On March 8, 1996, the RPG submitted a Prince William Sound logistics report prepared by Lyndon Logistic for ARCO Marine, Inc., which assessed air and water logistic support spill response capabilities in PWS. Assessment of available capacity was made during a holiday time period. This report utilized basic concepts and strategies set forth in the 1992 Air Logistic/Air Transport Availability Exercise Report completed by ARCO Aviation and Materials groups.

In a letter dated August 1, 1996, ADEC determined that equipment necessary for response to a major oil spill could be delivered to Kodiak by air freight during peak holiday season within the required time frames. Water transportation to Kodiak was available to provide primary or secondary support for equipment delivery. Based on the information provided by the RPG, ADEC determined that the requirements of COA 4 had been satisfied.

In an August 1, 1996, letter, ADEC also noted that, in addition to the contingency plans approved for individual tankers operating in PWS, it had entered into an agreement with the Kodiak Island Borough and the majority of plan holders to work with the U.S. Coast Guard to develop a unified State and federal Sub-Area Contingency Plan (Sub-Area Plan) for Kodiak Island which identified (1) delivery of spill equipment to the Kodiak Island Borough in adverse weather and (2) logistical considerations of delivering equipment to the Kodiak Island Borough by air and water.

Supporting Documents:

ADEC. (1995, August) Prince William Sound Oil Tanker Contingency Plan Review: Findings Document and Response to Comments. (950814 PWS Tanker Plan Final Findings).
651.410.950801.pdf

Chapple, T. (1995, October 2) Tom Chapple to Hersh Kohut, Arco Marine, Inc., October 2, 1995 [Approval Letter].
651.300.951003.DECplnAppvl.pdf

Chapple, T. (1996, August 1) Tom Chapple to Hersh Kohut, Arco Marine, Inc., Status "Conditions of Approval" for Prince William Sound Tankers Oil Discharge Prevention and Contingency Plan
651.300.960801.PWStkrODPCP

1996 Wildlife Training and Otter Hospital Compliance Schedule (1995 COA 7)

Plan holders:
ARCO Marine, Inc.; Atlantis Agency Corporation; Cambridge Tankers, Inc.; Chevron Shipping Company; First Shipmour Associates; Fourth Shipmour Associates; Intercontinental Bulktank Corporation; Interocean Management Corporation; Interocean Tanker Corporation; Juneau Tanker Corporation; Marine Transport Lines, Inc.; OMI, Inc.; Overseas Bulktank Corporation; First United Shipping Corporation; SeaRiver Maritime; Second Shipmour Associates, Inc.; Second United Shipping Corporation; Keystone Shipping; Third Shipmour Associates, Inc.; Third United Shipping Corporation; and Tesoro Alaska Petroleum Company.

Summary:
In its 1995 plan approval, ADEC required in COA 7 a compliance schedule for completing the development of training programs for wildlife-handling personnel by November 15, 1995. The training of the current wildlife-handling personnel was to be completed no later than February 15, 1996. Finally, the otter treatment facility in Valdez was to be completed according plan specifications by December 31, 1995.

On February 14, 1996, the RPG submitted the wildlife training courses offered in the SERVS training calendar at the Prince William Sound Community College. The training was offered on an annual basis and records of personnel receiving the training were maintained at SERVS. This training included wildlife rehabilitation specialty courses offered by wildlife research organizations, sponsored a major international wildlife conference for the exchange of technical information and advanced training, and offered a specialty course for oiled otter rehabilitation.

APSC/SERVS also set up the completed Otter Rehabilitation Center which was inspected on January 4, 1996, by ADEC, ADFG, and otter rehabilitation specialists.

In a letter dated August 1, 1996, ADEC determined, after consultation with ADFG, that (1) the training program would adequately prepare wildlife response teams; (2) personnel were trained according to the program; and (3) the otter treatment center in Valdez had been completed and found to be adequate. Based on its review of the training program and inspection of the otter treatment facility, ADEC determined that the requirements of 1995 COA 7 had been satisfied.

Supporting Documents:

ADEC. (1995) Prince William Sound Oil Tanker Contingency Plan Review: Findings Document and Response to Comments.
651.410.950801.pdf

Chapple, T. (1995, October 2) Tom Chapple, ADEC, to Hersh Kohut, Arco Marine, Inc., re: plan approval, October 2, 1995.
651.300.951003.DECplnAppvl.pdf

Chapple, T. (1996, August 1) Tom Chapple, ADEC, to Hersh Kohut, Arco Marine, Inc., re: Status "Conditions of Approval" for Prince William Sound Tankers Oil Discharge Prevention and Contingency Plan, August 1, 1996.
651.300.960801.PWStkrODPCP

1996 Recreational Areas in PWS (1995 COA 6)

Plan holders:
ARCO Marine, Inc.; Atlantis Agency Corporation; Cambridge Tankers, Inc.; Chevron Shipping Company; First Shipmour Associates; Fourth Shipmour Associates; Intercontinental Bulktank Corporation; Interocean Management Corporation; Interocean Tanker Corporation; Juneau Tanker Corporation; Marine Transport Lines, Inc.; OMI, Inc.; Overseas Bulktank Corporation; First United Shipping Corporation; SeaRiver Maritime; Second Shipmour Associates, Inc.; Second United Shipping Corporation; Keystone Shipping; Third Shipmour Associates, Inc.; Third United Shipping Corporation; and Tesoro Alaska Petroleum Company.

Summary:
In its 1995 plan approval, ADEC required in COA 6 amendment of the plan to include 1) identification of primary recreational use areas within Prince William Sound, 2) notification of the Alaska Wilderness Recreational and Tourism Association of major spill events, and 3) provisions to call attention to the need for awareness that recreational users may be isolated by a major spill event.

On February 14, 1996, the RPG submitted revisions to Supplemental Information Document #13 which identified primary recreational use areas, notification procedures, responder training to minimize intrusion, and a spill notification checklist. On February 21, 1996, the RPG provided, through SERVS and EMCON Alaska, an update to the GRD which included additional data on recreational use areas for Prince William Sound.

In a letter dated August 1, 1996, ADEC determined that the requirements of condition 6 had been satisfied.

Supporting Documents:

ADEC. (1995, August) Prince William Sound Oil Tanker Contingency Plan Review: Findings Document and Response to Comments. (950814 PWS Tanker Plan Final Findings).
651.410.950801.pdf

Chapple, T. (1995, October 2) Tom Chapple to Hersh Kohut, Arco Marine, Inc., October 2, 1995 [Approval Letter].
651.300.951003.DECplnAppvl.pdf

Chapple, T. (1996, August 1) Tom Chapple to Hersh Kohut, Arco Marine, Inc., Status "Conditions of Approval" for Prince William Sound Tankers Oil Discharge Prevention and Contingency Plan.
651.300.960801.PWStkrODPCP

1997 BAT Regulation Revisions

Plan holders: n/a

Summary:
When the oil spill statues at AS 46.04.030 were enacted, the Alaska Legislature did not define the term "best available technology." Instead, the Legislature directed ADEC to establish regulations to carry out the statutory BAT requirement among other new requirements included in the 1994 statutory changes.

In 1997, the requirement to address BAT in oil discharge prevention and contingency plans was included in regulations at 18 AAC 75.425 (e)(3)(4) Part 4 – Best Available Technology Review. A BAT review was to include communications, source control procedures, trajectory analyses and forecasts, and wildlife capture, treatment and release procedures. In addition, for tank vessels, the review was to include measures to assure prompt detection of an oil discharge.

This regulation, in turn, referenced 18 AAC 75.445 (k) for criteria on which the BAT review in the plan must be evaluated:

> (k) Best Available Technology Review. For the purposes of 18 AAC 75.425(e)(4), the department will review a plan and make a best available technology determination using the following criteria, as applicable:
> (1) Technology used for oil discharge containment, storage, transfer, and cleanup to satisfy a response planning standard in 18 AAC 75.430 - 18 AAC 75.442 will be considered best available technology if the technology of the applicant's oil discharge response system as a whole is appropriate and reliable for the intended use as well as the magnitude of the applicable response planning standard;
> (2) Technology that complies with the performance standards of 18 AAC 75.005 – 18 AAC 75.080 and that is not subject to a best available technology review under 19 AAC 75.425(e) (4)(A), will be considered best available technology.
> (3) Technology identified under 18 AAC 75.425 (e)(4)(A) will be evaluated using the following criteria, if applicable:
>
> > (A)…whether each technology is the best in use in other similar situations and is available for use by the applicant;
> > (B) whether each technology is transferable to the applicant's operations;
> > (C) whether there is a reasonable expectation each technology will provide increased spill prevention or other environmental benefits;
> > (D) the cost to the applicant of achieving best available technology, including consideration of that cost relative to the remaining years of service of the technology in use by the applicant;
> > (E) the age and condition of the technology in use by the applicant;
> > (F) whether each technology is compatible with existing operations and technologies in use by the applicant;
> > (G) the practical feasibility of each technology in terms of engineering and other operational aspects; and

(H) whether other environmental impacts of each technology, such as air, land, water pollution, and energy requirements, offset any anticipated environmental benefits.

The BAT regulations have remained unchanged since codified in 1997.

1998 Adjudicatory Hearing re: 1995 Plan Approval on Phasing and Copper River

Summary:
ADEC's formal approvals of the oil discharge prevention and contingency plans on October 2, 1995, along with conditions placed on those approvals, resulted in the filing of adjudicatory hearing requests from several different parties. Former ADEC Commissioner Gene Burden granted adjudicatory hearing requests brought by Tom Copeland, Tom Lakosh, Kristin Stahl-Johnson, Cordova District Fishermen United and United Fisherman for Alaska (collectively CDFU), and BP Oil Shipping Co. and SeaRiver Maritime, Inc. (Shippers). Commissioner Burden also granted adjudicatory requests brought by the City of Cordova and the Kodiak Island Borough which were subsequently withdrawn in 1995. The Shippers adjudicatory hearing requests were later settled and withdrawn.

Eight subsequent adjudicatory hearing requests were filed by CDFU and granted by Commissioner Michele Brown concerning actions by ADEC on the plan holders' submittals in response to the COAs placed on the 1995 contingency plan approvals. These challenges to ADEC's actions on the COAs were consolidated with the 1995 contingency plan adjudication A complete history of the proceeding is summarized in the Final Decision, dated August 14, 1998, issued by attorney Robert M. Johnson who acted as the Deciding Officer under a delegation issued by then ADEC Commissioner Michele Brown. The purpose of this discussion is not to summarize the history of the adjudication but rather to identify the Deciding Officer's rulings that had subsequent impacts on the tanker plans themselves and how ADEC addressed later contingency plan renewals.

Phasing in Conditions of Approval
The 1995 Contingency Plan approvals included eight conditions of approval (nine in the case of the Tesoro Alaska Petroleum plan). CDFU challenged ADEC's conditions of approval as illegal "phasing" or deferral of decision on major portions of the plans, and argued that even if the conditions were permissible, that the plan holders' submissions to comply with the conditions must be subject to formal ADEC review procedures and a new Alaska Coastal Management Program consistency determination.1

The Deciding Officer concluded, as a matter of law, that "to-be-determined" conditions of approval, if data is justifiably not yet complete and provided the process is not used to circumvent public input rights, may be deemed appropriate conditions of approval under ADEC's authority under AS 46.04.03(e) and 18 AAC 75.455(i).2 He concluded that the decision to impose each condition must be considered as a factual matter to determine whether ADEC had or should have had sufficient data to avoid a "to-be-determined condition." In the context of 1995 COA 2 involving improvements to the tanker escort system, the Deciding Officer concluded that ADEC did have factual grounds to impose to-be-determined escort improvements through the condition of approval given ADEC's lack of complete information at the time of the plan approval.3 In the context of 1995 COA 7 involving protection strategies for

the Kodiak Region of Operation, the Deciding Officer upheld ADEC's imposition of that condition under the review standards provided in 18 AAC 75.415.

The Deciding Officer also concluded that when ADEC imposes a permissible "to-be-determined" condition of approval that ADEC must then use the public review procedures applicable to contingency plan renewals in order to provide the public with the ability to review and comment on the submissions provided to satisfy the condition of approval.4 Subsequent to the Deciding Officer's Final Decision in August 2018, ADEC has imposed COAs that fall into one of three categories using the framework of his Phasing decisions: 1) compliance conditions that do not require subsequent public review; 2) specific approval requirements mandating that specific language be incorporated into a plan that do not require subsequent public review, or 3) appropriate "to-be-determined" conditions requiring submittals that must then undergo public review as a major amendment to the contingency plans.

Protection of the Copper River Delta and Flats

CDFU contended that the contingency plans must require fully planned, pre-positioned response for the Copper River Delta and Flats as an environmentally sensitive area under ADEC's regulations because it was located within the Prince William Sound region of operation. The Deciding Officer rejected the legal contentions of CDFU concerning the necessity for a fully planned, pre-positioned response in a plan holder's region of operation irrespective of whether an area is likely to be affected by a discharge.5

ADEC had required as part of 1995 COA 8 that the PWS plan holders perform and submit oil spill trajectory analyses for two hypothetical spill events inside state waters to determine the likelihood of oil impacting the Copper River Delta or Flats from two locations within Prince William Sound. ADEC subsequently concluded that the plan holders' submittal required by 1995 COA 8 did not satisfy the condition of approval because the submitted information was insufficient to render a predictive likelihood determination.6 ADEC then required, as part of the 1998 contingency plan renewal application, additional modeling as well as response strategies for locations such as Hawkings Island Cutoff that could prevent oil migration from the central sound to the Copper River Delta and Flats.7 The Deciding Officer heard testimony on the Copper River Delta and Flats issue during the adjudicatory hearing and upheld ADEC's decision imposing 1995 COA 8 and its subsequent decision concerning the plan holders' submission under 1995 COA 8.

Prior to the hearing, ADEC, the Shippers, and CDFU reached a settlement of the Copper River Delta and Flats contingency plan issue with the Shippers agreeing to develop geographical response plan strategies for those areas that were then to be incorporated into the Prince William Sound Subarea Plan.8 This effort was the precursor to later efforts to develop Geographical Response Strategies (GRSs) for many areas in PWS, the Kenai Peninsula, and Kodiak Regions that were then incorporated in Subarea Plans for use by plan holders.

Supporting Documents:

Kodiak Island Borough, ADEC, ARCO Marine, Inc. and BP Oil Shipping Company, USA (as agent for and on behalf of Keystone Shipping; lnterocean Management Corp., Atlantic Agency, OMI Corp., Marine Transport Lines, First Shipmore, Second Shipmore, Third Shipmore, Fourth Shipmore, First United, Second United, Third United, Overseas Bulktank, Juneau Tanker Corp., Cambridge Tankers, lnterocean Tanker Corp., and International Bulktank Corp.); West Coast Shipping, and Tesoro Alaska Petroleum, Settlement Agreement June 12, 1996
651.300.960812.KIBSettlement

Johnson, R. (1998, February 3) Adjudication of Prince Adjudication of Prince William Sound Oil Tanker Contingency Plans Approved October 2, 1995 and Consolidated Matters, Order Respecting Motions for Summary Judgment Relating to Escort Tugs and BAT: Issue "B" (Docket Nos. 491 and 550)
Order Respecting Mtns for Summary Judgment Relating to Escort Tugs and Bat Issue B

Johnson, R. (1998, February 9) Adjudication of Prince Adjudication of Prince William Sound Oil Tanker Contingency Plans Approved October 2, 1995 and Consolidated Matters, Order Respecting Motions for Summary Judgment Relating to Phasing: Issue "P" (Docket Nos. 479 and 545)
Order Respecting Mtns for Summary Judgment Relating to Phasing Issue P

Cordova District Fishermen United, United Fishermen of Alaska, Alaska Department of Environmental Conservation, ARCO Marine Inc., SeaRiver Maritime Inc., BP Oil Shipping Company, (1998, February 25) "Settlement Agreement for PWS Tanker Contingency Plans" and Cordova District Fishermen United, United Fishermen of Alaska, and Alaska Department of Environmental Conservation, (1998, February 12) "Settlement Agreement for PWS Tanker Contingency Plan Appeals"
651.110.980224.TankerStlAgt.pdf).

Johnson, R. (1998, August 14) Adjudication of Prince William Sound Oil Tanker Contingency Plans Approved October 2, 1995 and Consolidated Matters, Final Decision by Deciding Officer 1995 PWS Tanker C-plans and Consolidated Matters Final Decision by Deciding Officer August 1998.pdf

1998 Tanker Escort Improvements (1995 COA 2)

Plan holders:
ARCO Marine, Inc.; Atlantis Agency Corporation; Cambridge Tankers, Inc.; Chevron Shipping Company; First Shipmour Associates; Fourth Shipmour Associates; Intercontinental Bulktank Corporation; Interocean Management Corporation; Interocean Tanker Corporation; Juneau Tanker Corporation; Marine Transport Lines, Inc.; OMI, Inc.; Overseas Bulktank Corporation; First United Shipping Corporation; SeaRiver Maritime; Second Shipmour Associates, Inc.; Second United Shipping Corporation; Keystone Shipping; Third Shipmour Associates, Inc.; Third United Shipping Corporation; and Tesoro Alaska Petroleum Company.

Summary:
In its approval of the 1995 plan, ADEC required in COA 2 that the plan holders assure the use of BAT through (a) a proposal for interim improvements to the tanker escort system during the winter months for tankers over 190,000 DWT while transiting through the Valdez Narrows, and (b) a proposal for escort system improvements for the duration of the plan approval within 60 days after issuance of the Prince William Sound Risk Assessment final report.

In December 1996, the Prince William Sound Risk Assessment was completed. The risk assessment concluded that the escort system was the single most effective risk reduction measure in PWS.

In early 1997, ADEC promulgated new regulations, adding the requirement for a BAT review of certain aspects of the contingency plans, including the escort system. Prior to this, there had been a statutory requirement for BAT but no guidance in regulation as to how to implement the statute. The new regulations took effect as the RPG was working to address 1995 COA 2a and 2b.

Following completion of the risk assessment in 1997, the RPG convened an Enhanced Escort System Task Force to identify, test, and develop appropriate tug technology for the PWS escort system to meet the requirements of COA 2b of the 1995 plan approval.

In February 1997, the RPG reported to ADEC on their efforts to comply with COA 2b. The RPG had formed sub-committees to implement the findings of the risk assessment and was committed to the following escort tug enhancements:

1. Charter a high horsepower tug for service at Hinchinbrook Entrance (the Gulf Service);
2. Conduct sea trials of the Crowley Protector Class tugs (if they performed better than the existing escort tugs, an arrangement would be made to replace the existing tugs with the Protector Class tugs);
3. Develop a plan to upgrade the current tug fleet and implement the plan with at least two new tugs in service by the year 2000; and
4. Revise tug operating procedures.

In March 1997, the RPG also reported to ADEC on the process they had used to determine the requirements for an escort tug to meet the State's newly-promulgated BAT regulations. They stated that PWS stakeholders, including ADEC, were consulted or had participated in extensive studies, performance trials, and field trips to observe various tugs in operation. The RPG concluded that ETTs had the capabilities best suited to the needs of the escort duties in PWS. They developed request for proposal (RFP) criteria and specifications for tugs that included requiring VSP. Separate performance criteria were developed for Valdez Narrows, Valdez Arm, and PWS.

The RPG also reported on their program to further enhance the escort system. The first Protector Class tug had been brought into PWS in December 1996 as an interim measure, but simulations and performance trials led them to conclude that the Protector Class did not improve the overall safety of the escort system. (Protector class tugs were approved as escorts for smaller tankers only.) These trials did lead to the development of protocols for trials to evaluate the performance of tugs and maneuvers to assist tankers in distress.

The RPG requested that ADEC determine whether a tug meeting certain performance criterion (spelled out in the March 1997 letter) would meet the State's BAT requirement at 18 ACC 75.445(k)(3). Once that determination was received, the RPG indicated that they would begin a procurement process that would result in two new tugs being delivered no later than the end of 1999.

The RPG included the draft RFP and draft description of the proposed enhanced escort system with their March 1997 letter to ADEC and shared these with PWSRCAC as well.

On April 9, 1997, ADEC replied to the RPG and approved performance criteria for the RFP as meeting the State's BAT requirement, with the reservation that if the chosen tug design did not have VSP, an additional approval would be necessary. ADEC also approved the description of the enhanced escort system. On May 2, 1997, ADEC issued a formal BAT decision for Condition 2b, indicating that the plans submitted by the RPG met the State's regulations at 18 AAC 75.425(e)(4) and 18 AAC 75.445(k)(1-2). Finally, ADEC approved the rescue tug Gulf Service as BAT for the escort at Hinchinbrook Entrance on an interim basis for the immediate term of the 1995 plan approval.

On May 21, 1997, the USCG Commander of the 17th District sent a memorandum to the Commanding Officer of the Valdez Marine Safety Office stating that the federal regulations (33 CFR 168) did not preclude a "sentinel" tug escort (USCG, 1997), so the sentinel escort proposed by the RPG was found to be in compliance with USCG regulations.

In October 6, 2017, the RPG presented an Enhanced Escort System Proposal including sentinel-based escort in the central Sound. In November 1997, ADEC issued a public notice to approve changes to the escort system in fulfillment of condition 2a.

On May 6, 1998, ADEC completed its review of public comments, tug performance simulations, actual sea trials information and proposed changes to the escort system. The results of ADEC's

analysis were contained in Response to Comments on Interim Tug Escort Improvements (April 22, 1998) and Proposed Sentinel Escort System and the Best Available Technology Support Document (April 22, 1998). As a result, ADEC approved incorporation of the Protector Class tugs into the escort system as a formal plan amendment with rights to request an adjudicatory hearing.

On October 5, 1998, ADEC concluded that the interim escort improvement requirements of COA 2a had been satisfied after reviewing the September 1 version of the VERP and a letter from RPG dated September 30, 1998.

Supporting Documents:

Atkinson, J. (1995). Report of Investigation into Alternatives Available by the Winter of 1995-96 That Could Enhance the Ability to Save Disabled Tankers of Over 190,000 DWT in Valdez Narrows. Marine Consultant, Charlottesville, VA. June 15.
801.410.959615.SaveDisTank.pdf

ADEC. (1995) Prince William Sound Oil Tanker Contingency Plan Review: Findings Document and Response to Comments.
651.410.950801.pdf

Chapple, T. (1995, October 2) Tom Chapple, ADEC, to Hersh Kohut, Arco Marine, Inc., re: Approval Letter, October 2, 1995.
651.300.951003.DECplnAppvl.pdf

Chapple, T. (1997). Tom Chapple, ADEC, to Contingency Plan Holders and Interested Parties re: Adoption of Regulations for Best Available Technology, January 21, 1997.
661.300.970121.ADECbatRegs.pdf

Mitchell, V., Carney, P., Randall, G., Jones, T., and Hyce, L. (2001). Escort Tug Analysis for Oil Tankships in Prince William Sound and the Gulf of Alaska. Hampton Roads Section of The Society of Naval Architects and Marine Engineers (SNAME). Hampton, VI. June 1.
801.107.010414.Escorttugan.pdf

Lisiecki, S. (1997, February 5). Simon Lisiecki, BP, to Tom Chapple, ADEC, re: State of Alaska Approval for Oil Discharge Prevention and Contingency Plan, Terms and Conditions – 2b, February 5, 1997.
651.300.970205BPtkrCond2d.pdf

Lisiecki, S. (1997, March 31). Simon Lisiecki, BP, to Tom Chapple, ADEC, re: State of Alaska Approval for Oil Discharge Prevention and Contingency Plan, Terms and Conditions 2 (b), March 31, 1997.
651.300.970331.BPCplanCmplc.pdf

Jones, T. (1997, April 7). Protector Class Tug Trials: January/February 1997 Preliminary Report. Prepared for PWSRCAC Oil Spill Prevention and Response Committee; Port Operations and Vessel Traffic Committee.
801.431.970407.ProtectorV2.pdf

Chapple, T. (1997, April 9). Tom Chapple, ADEC, BP on behalf of the Prince William Sound Tanker Plan Holders re: Application of Best Available Technology Requirements for Escort Vessels: Condition 2b of October 2, 1995 Prince William Sound Tanker Contingency Plan Approval, April 9, 1997.
661.300.970409.BATcplanCon2.pdf

Alaska Department of Environmental Conservation (ADEC). (1997, May 2). Best Available Technology Decision for Condition 2b PWS Tanker Contingency Plan Approvals: Technical Support Document.
651.410.970502.ADEC2bBATdoc.pdf

United States Coast Guard (USCG). (1997, May 21). Commander, District 17, to USCG Commanding Officer Marine Safety Office, Valdez, re: Change to Tanker Escort Regulations for Prince William Sound, May 21, 1997.
801.300.970521.ChgsTkrEscPWS.pdf

Lisiecki, S., (2017, October 6) Simon Lisiecki, BP Oil Company on behalf of the RPG, to Tom Chapple, ADEC, re: Enhanced Escort System, October 6, 2017.
801.300.971006.BPEnhEscSyst.pdf

Alaska Department of Environmental Conservation. (2017) Public Notice Enhanced Escort Proposal for Condition 2a of Department's October 2, 1995 Oil Spill Discharge Prevention and Contingency Plan approvals, Summary of Proposed Changes to Escorting of Oil Tankers in Prince William Sound, Public Review Draft, November 7, 1997, Technical Support Document.
651.410.971107.BATcond2CPapp.pdf and November 1997 Public Notice on 1995 COA 2A Escort Changes.pdf

Chapple, T. (1998, May 6) Tom Chapple, ADEC, to Patrick Carney, on behalf of PWS Plan Holders, re: Application of Best Available Technology Requirements for Interim Escort Improvements; Condition 2a of October 2, 1995 Prince William Sound Tanker Contingency Plan Approval, May 6, 1998.
651.300.980506.DECtkrCond2a.pdf and DEC Decision Document App of Best Available Technology Requirements for Interim Escort Improvements 5-6-1998.pdf

Provant, S. (1998, October 5). Steve Provant, ADEC, to Patrick Carney, on behalf of PWS Plan Holders, re: Prince William Sound Tanker Oil Discharge Prevention and Contingence Plans, October 2, 1995 Condition of Approval 2a, October, 5, 1998.
651.300.981005.ADECtkrCOA2a.pdf

1999 Plan Renewal

Plan holders:
Alaska Tanker Co., ARCO Marine, Inc., Chevron Shipping Co., SeaRiver Maritime Inc., Tesoro Alaska Petroleum Co.

Summary:
This was the second renewal under the post-EVOS contingency plan statute and the 1992 "HB 567 regulations". At this time, the plan consisted of a Response Action Plan, Notification Procedures, Prevention Plan, Response Strategies, Training and Drills, Best Available Technology, Vessel Specific and Geographic Specific Appendices, and the PWS Core Plan. The PWS Core Plan consisted of two volumes: Volume 1 containing Part 1 – Response Action Plan and Part 2 – Prevention Plan (215 pages) and Volume 2 containing Part 3 – Supplemental Information Documents and Part 4 – Best Available Technology (854 pages). Significant portions were updated since 1995 and the plans were reorganized and consolidated to make them more user friendly.

The plan was submitted for approval in July 1998. In addition to the written RFAI process, ADEC also held community workshops and public hearings in Valdez, Anchorage, Cordova, Kodiak, and Seward. The communities of Homer and Seldovia were linked into the Anchorage hearing. ADEC issued two short-term extensions of its 1995 contingency plan approvals in order to complete the public review.

In November 1999, ADEC approved the plan with findings on six major Issues and 44 specific responses to comments. ADEC also included 10 conditions of approval (COA) in its approval letter.

In December 1999, conditions 3-9 of the plan approval were challenged by ARCO Marine, SeaRiver Maritime, and BP Oil Shipping Co. (on behalf of Alaska Tanker Co.). Tom Lakosh also sought an adjudicatory hearing on the plan approval. The shippers' hearing requests were withdrawn in March 2000 after discussions and submittals to ADEC concerning the conditions of approval. Tom Lakosh's hearing request was denied by Hearing Officer Shelley Higgins in May 2000 as not meeting the requirements of ADEC adjudicatory hearing rules.

Findings from 1999 established a few important areas of compliance and six issues requiring further attention. The findings identify both prevention and response improvements since the 1995 tanker plan approvals. Items that were raised during the 1999 plan approval process but essentially resolved at that time were:

1. In-Region and Out-of-Region Equipment Identification and Contractual Arrangements
2. Consistency with the applicable Alaska Coastal Management Program district policies for Cordova, Kodiak, Whittier, and Valdez;

3. BAT assessments for communications, measures for source control procedures to stop the discharge at its source and prevent its further spread, trajectory analysis and forecasts, and prompt detection of an oil spill; and
4. BAT for the Prince William Sound towing package or an approved equivalent system.

Ten conditions of approval were included for all plan holders including requirements for:

1. Notification of changed relationship with response contractor.
2. Setting a deadline for submission of the 2002 renewal request, and a process for working on the renewal in the interim.
3. A Geographic Response Strategy (GRS) workgroup for Prince William Sound and the outer Kenai Peninsula coast to be modeled after the process used in Cook Inlet, incorporation in the plan references to all currently approved Geographical Response Strategies in the Kodiak, Cook Inlet and Prince William Sound Sub Area Plans, an update to the Geographical Resource Database (GRD) annually, incorporation into the GRD references to the Port Graham/Nanwalek Area Meriting Special Attention, and conducting a minimum of five equipment deployments to test tactics in new GRSs prior to submittal for adoption in the Subarea plan.
4. A scenario workgroup to be co-chaired by ADEC and the plan holder.
5. Demonstration of access to five secondary storage barges to support nearshore response operations.
6. Modification and updates to spill response training for fishing vessel response.
7. Respirator training to 18 Tier 1 fishing vessels.
8. Simulation and sea trials for Hinchinbrook Entrance tanker escort operations in order to assess the plan holder's July 28, 1999, proposal for a change to the Hinchinbrook Entrance escort operations.
9. Reports if a vessel is involved in a reportable incident along TAPS trade route.
10. The submittal of conforming plan edits within 45 days.

Actions resulting from COA's 3 – 9 are incorporated into the Tanker Plan Timeline and summaries are included elsewhere in this report.

Supporting Documents:

Prince William Sound Tanker Plan Holders. (1999) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan, Volumes 1 and Volume 2, Second Edition, Rev. 0.
651.410.011108.PWStankCplan

ADEC (1999) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plans, Draft Findings Document, June 1999.
651.300.990601.ADECdraftFindingsDoc.pdf

ADEC. (1999) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plans, Findings Document, October 1999.
651.410.991001.ADECtkrFinds.pdf

Alaska Department of Administration. (2000) Shelley J. Higgins, Deciding Officer, Memorandum and Order Denying [Tom Lakosh] Request for Hearing, May 1, 2000.
651.110.00501.DOAtkrDenylte.pdf

ARCO Marine, Inc. (1999) Request for Adjudicatory Hearing on November 2, 1999 Approval, Charles Flynn, Burr, Pease & Kurtz, December 2, 1999.
651.110.991102.ARCOAdjHearRqst.pdf

ARCO Marine, Inc. (2000) Notice of Withdrawal of Adjudicatory Hearing Request re November 2, 1999 Tanker Cplan Approval, March 3, 2000.
651.300.000302 NotWithrARCO.pdf

ARCO Marine Inc., BP Oil Shipping Company, USA, and SeaRiver Maritime (1999) Motion for Stay of Enforcement of Condition 3, Condition 4, Condition 7 and Condition 9 to the Oil Spill Contingency Plan Approval Dated November 2, 1999, December 2, 1999.
651.110.991202.TkrCplStayOr.pdf

ARCO Marine Inc., BP Oil Shipping Company, USA, and SeaRiver Maritime. (1999) Memorandum in Support of Motion for Stay of Enforcement of Condition 3, Condition 4, Condition 7 and Condition 9 to the Oil Spill Contingency Plan Approval Dated November 2, 1999, December 2, 1999.
651.110.991202.TkrStaySuppo.pdf

BP Oil Shipping Company, USA and Alaska Tanker Company (1999) Request for Adjudicatory Hearing on November 2, 1999 Approval, Charles Flynn, Burr, Pease and Kurtz, December 2, 1999.
651.110.991202. TkrCPlanHear.pdf

BP Oil Shipping Company USA. (2000) Notice of Withdrawal [of Adjudicatory Hearing Request re November 2, 1999 Tanker Cplan Approval], March 3, 2000.
651.110.000303 BPOSS Notice of Withdraw Adj Request.pdf

Harvey, S. (1999, November 2) Susan Harvey, ADEC, to Timothy J. Clossey, ARCO Marine, Inc., re: Approval Letter, November 2, 1999. (This letter was the same as that provided to the other plan holders.)
651.300.991102.ADECaprvARCO.pdf

SeaRiver Maritime, Inc. (1999) Request for Adjudicatory Hearing on November 2, 1999 Approval, Kevin Callahan, Patton Boggs LLP, December 2, 1999.
651.110.991202.TkrCplanHrSR.pdf

SeaRiver Maritime, Inc. (2000) Notice of Withdrawal of Hearing Request re November 2, 1999 Tanker Cplan Approval], March 3, 2000.
651.110.000303 SeaRiver Notice of Withdraw Adj Request.pdf

PWSRCAC Comments:

Date	Communication	Contents	Doc Management
December 1998	Letter to ADEC	Request for Additional Info; PWS ODPCP (220 pp)	651.105.981204.TNKcplanCmnt.pdf
April 1999	Letter to ADEC	Issues identified 1998 PWS ODPCP Review (2 pp)	651.105.990402.ADECcplnRCAC.pdf
July 1999	Letter to ADEC	Additional Comments on ADEC's Draft Finding for PWS ODPCP (2 pp)	651.105.990712.TNKcplanCmnt.pdf
August 1999	Letter to ADEC	Condition 5 – BAT; and Condition 3 – Fishing Vessels (4 pp)	651.105.990826.TNKcplanCmnt.pdf
June 2001	Letter to ADEC	PWS Tanker Plan Scenario Handouts (2 pp)	651.105.010611.PWSTkrScenCm.pdf
July 2001	Letter to ADEC	RPG submittals on PWS TP COA #4 Scenarios (4 pp)	651.105.010703.COA4WkgpCmts.pdf

1999 Copper River Delta Oil Spill Trajectory Analysis and Agreement (1995 COA 8)

Plan holders:
ARCO Marine, Inc.; Atlantis Agency Corporation; Cambridge Tankers, Inc.; Chevron Shipping Company; First Shipmour Associates; Fourth Shipmour Associates; Intercontinental Bulktank Corporation; Interocean Management Corporation; Interocean Tanker Corporation; Juneau Tanker Corporation; Marine Transport Lines, Inc.; OMI, Inc.; Overseas Bulktank Corporation; First United Shipping Corporation; SeaRiver Maritime; Second Shipmour Associates, Inc.; Second United Shipping Corporation; Keystone Shipping; Third Shipmour Associates, Inc.; Third United Shipping Corporation; and Tesoro Alaska Petroleum Company.

Summary:
In its 1995 plan approval, ADEC required in COA 8 that the PWS plan holders perform and submit oil spill trajectory analyses for two hypothetical spill events inside state waters to determine the likelihood of oil impacting the Copper River Delta or Flats. On May 29, 1996, the RPG submitted two technical documents responding to 1995 COA 8.

On May 27, 1997, ADEC, in a ten-page findings document, concluded that the plan holders' submittal did not satisfy the COA because the submitted information was insufficient to render a predictive likelihood determination. ADEC then required, as part of the 1998 contingency plan renewal application, additional modeling, as well as response strategies for locations such as Hawkings Island Cutoff that could prevent oil migration from the central sound to the Copper River Delta and Flats. That decision was the subject of a subsequent adjudicatory hearing request that was granted by ADEC Commissioner Michele Brown.

The Deciding Officer heard testimony on the Copper River Delta and Flats issue during the adjudicatory hearing and upheld ADEC's decision imposing 1995 COA 8 and its subsequent decision concerning the plan holders' submission under 1995 COA 8.

Prior to the hearing, ADEC, the Shippers, and CDFU/UFA reached a settlement of the Copper River Delta and Flats contingency plan issue. The Shippers agreed to develop GRS for those areas for incorporation into the Prince William Sound Subarea Plan. On March 3, 1998, ADEC issued a public notice that it was amending Condition 8 to conform to this Copper River Settlement Agreement process. On April 22, 1998, ADEC issued a decision removing 1995 COA 8 from the 1995 Plan Approval in lieu of the Copper River Settlement Agreement.

The Copper River Delta and Flats work group developed the GRS between April 1998 and June 1999. On June 18, 1999, the Subarea Committee Co-Chairs approved the Copper River Delta and Flats addendum as Change 1 and announced a work group to produce a Change 2.

As part of the Settlement Agreement, a Copper River Delta and Flats Exercise was conducted on April 17-20, 2000, in Orca Inlet by SERVS, Alaska Chadux and the U.S. Coast Guard.

The final March 2020 Prince William Sound Area Contingency Plan (Version 2018.1) states "The PWS Area has been divided into five Geographic Response Zones (Figure G-1-1). The Copper River Delta Flats Zone strategies were developed through a separate Work Group process and are not included in this document. The Copper River Delta Flats GRS are considered a separate annex to the PWS Area Contingency Plan at this time."

Supporting Documents:

ADEC. (1995) Prince William Sound Oil Tanker Contingency Plan Review: Findings Document and Response to Comments.
651.410.950801.pdf

Chapple, T. (1995, October 2) Tom Chapple, ADEC, to Hersh Kohut, Arco Marine, Inc., October 2, 1995 re: Approval Letter, October 2, 1995.
651.300.951003.DECplnAppvl.pdf

Chapple, T. (1996, August 1) Tom Chapple, ADEC, to Hersh Kohut, Arco Marine, Inc., re: Status "Conditions of Approval" for Prince William Sound Tankers Oil Discharge Prevention and Contingency Plan, August 1, 1996.
651.300.960801.PWStkrODPCP

Chapple, T. (1997, May 27) Tom Chapple, ADEC, to Simon Lisiecki, BP Oil Shipping Co., on behalf of the RPG, re: Assessment of the likelihood of spilled oil being transported to the Copper River Delta or Flats; Condition 8 of October 2, 1995 Prince William Sound Tanker Contingency Plan Approval, May 27, 1997.
651.431.970527.ADECtkrCond8.pdf

Johnson, R. (1998) Adjudication of Prince William Sound Oil Tanker Contingency Plans Approved October 2, 1995, and Consolidated Matters, Final Decision by Deciding Officer.
1995 PWS Tanker C-plans and Consolidated Matters Final Decision by Deciding Officer August 1998.pdf

Cordova District Fishermen United, United Fishermen of Alaska, Alaska Department of Environmental Conservation, ARCO Marine Inc., SeaRiver Maritime Inc., BP Oil Shipping Company. (1998) Settlement Agreement for PWS Tanker Contingency Plans.
651.110.980224.TankerStlAgt.pdf

Chapple, T. (1998, March 3), Tom Chapple, ADEC to Plan Holders, Review Participants and Commentors, re: Public Notice to Amend Condition 8 of ADEC's Approval for the oil shippers' PWS Tanker Discharge Prevention and Contingency Plan, March 3, 1998.
651.300.980326.DECamndCond8.pdf

Chapple, T. (1998, April 22) Tom Chapple, ADEC, to Patrick Carney, BP Oil Shipping Co, on behalf of the Prince William Sound Tanker Plan Holders, re: Amendment to Plan Approval Condition #8, April 22, 1998.
651.300.980422.ADECtkrCOA8.pdf

Iwamoto, L. (1999) Presentation for a public meeting on the Prince William Sound Subarea Contingency Plan (Draft Change 1), describing the Alaskan subareas, and providing an overview of Change 1 with maps for the Copper River Delta and Flats (CRDF) addendum.
600.107.990301.PWSsacpDft.pdf

Lautenberger, C., Morris, R., Hahn, B., (1999, June 18) Carl Lautenberger, US EPA Region 10, Captain Ronald Morris, COTP Prince William Sound, Brad Hahn, Alaska Department of Environmental Conservation Subarea Co-Chair, to John Devens, PWSRCAC, re: USCG Change 1 to the PWS Subarea Plan for Copper River Delta and Flats, June 18, 1999.
651.300.990618

Copper River Delta and Flats GRS (1999) Prince William Sound SCP, GRS, part one (Change 1 – July 1999)
600.450.990701.SubaCrdfGRSplan.pdf

Requirements of Settlement Agreement for PWS Tanker Contingency Plans (Copper River Delta & Flats) (2000, February 8)
651.410.000208.TKRepAgeem.pdf

Delozier, M. (2000, April 17) Mark Delozier, SERVS, to Joe Banta, PWSRCAC, re: A Report Entitled Copper River Delta & Flats Exercise, April 17, 18, 19, 20, 2000; April 17, 2000.
752.410.000417.CRD&FDrillEx.pdf

Prince William Sound Subarea Contingency Plan, Geographical Response Strategies Section (2014, October).
pws-scp-g-grs Change 3, October 2014

Prince William Sound Area Contingency Plan, Version 2018.1, Final March 2020
pws-area-plan Version 2018.1, Final March 2020

2000 Geographic Response Strategy (1999 COA 3)

Plan holders:
Alaska Tanker Co., ARCO Marine, Inc., Chevron Shipping Co., SeaRiver Maritime Inc., Tesoro Alaska Petroleum Co.

Summary:
Condition of Approval (COA) 3 from the 1999 plan renewal approval required that the plan holders:

a. participate in a Geographic Response Strategy (GRS) workgroup for Prince William Sound and the outer Kenai Peninsula coast to be modeled after the process used in Cook Inlet,
b. incorporate in the plan references to all currently approved Geographical Response Strategies in the Kodiak, Cook Inlet, and Prince William Sound Sub-Area Plans, update the Geographical Resource Database (GRD) annually,
c. incorporate into the GRD references to the Port Graham/Nanwalek Area Meriting Special Attention, and
d. conduct a minimum of five equipment deployments to test tactics in new GRSs prior to submittal for adoption in the Subarea plan.

On February 28, and March 1, 2000, the RPG submitted amendments to Part 3, SID #3, and Section 2.1 to satisfy 1999 COA 3(b) (incorporate GRS references into the plan). On March 3, 2000, ADEC found that the proposed changes satisfied 1999 COA 3(b) and directed that they be included as a minor amendment to the plan.

On March 1, 2000, the RPG proposed a draft Memorandum of Agreement (MOA) for participation in a GRS workgroup for Prince William Sound and the outer Kenai Peninsula, and for equipment deployments to test tactics for a minimum of five new GRS sites per year as called for in COA 3(a) and (c). On March 3, 2000, ADEC approved the MOA as appropriate for meeting those requirements. The Workgroup held its formative meeting on March 28, 2000.

In May 2000, the MOA was signed by ADEC, USCG, Alaska Tanker Company, LLC, Alyeska Pipeline Service Company, Tesoro Maritime Company, SeaRiver Maritime, Inc., Chevron Shipping Company, LLC, ARCO Marine, the U.S. Forest Service, U.S. Department of Interior, National Oceanic and Atmospheric Administration, Alaska Department of Fish and Game, Alaska Department of Natural Resources, and PWSRCAC. The MOA set a deadline of January 1, 2001, for the first five GRSs to be developed. The MOA divided PWS into four regions for the development of GRS over the term of the plan renewal.

As part of the SeaRiver Maritime, Inc., PWS exercise in June 2000, GRSs were developed for sensitive sites in the vicinity of the Village of Tatitlek.

In September 2000, the PWS GRS workgroup identified a preliminary list of candidate sites for GRS development in the northeast and southwest PWS zones. In October 2000, the PWSRCAC proposed the addition of Point Elrington in southwest PWS as a GRS site because of its status as a major haul-out for Steller's sea lions.

In June 2001, Chevron Shipping Company conducted a GRS Exercise as part of Condition 3 in the area of the Village of Chenega.

In July 2001, ADEC found that the RPG had met condition 3(a) for the year 2001 by its active participation in the GRS workgroup and completing five GRS. To fulfill the remainder of condition 3(a), the letter noted that an additional 15 GRS were to be completed by November 1, 2002.

In September 2001, the PWSRCAC undertook a public input process concerning the selection of GRS locations in PWS. The PWSRCAC later prepared a summary of public comments.

In December 2001, a MOA was entered into by ADEC, Kenai Peninsula Borough, USCG, Cook Inlet RCAC, PWSRCAC, Alaska Chadux Corporation, Alyeska SERVS, and Tesoro Maritime Company for a workgroup to draft 40 GRS for the outer Kenai Peninsula coast.

In September 2002, the PWS plan holders, ADEC, USCG, and PWSRCAC entered into a new MOA for a workgroup to draft GRS for 20 additional20 sites in PWS with the testing of 12.

Supporting Documents:

ADEC, Kenai Peninsula Borough, U.S. Coast Guard, Cook Inlet RCAC, PWSRCAC, Alaska Chadux Corporation, Alyeska SERVS, &Tesoro Maritime Company (2001) Memorandum of Agreement for a Workgroup to draft 40 Geographic Response Strategies for the outer Kenai Peninsula coast.

654.590.011214.Kenaigrsmoa.pdf

ADEC, USCG, et al. (2002) Memorandum of Agreement between ADEC, USCG, Plan Holders and Interested Parties Workgroup to draft Geographical Response Strategies for Prince William Sound.

654.590.020917.PWSgrsMOA

Carney, P. (2000, February 28) Patrick Carney, BPOSS on behalf of RPG, to S. Provant, ADEC, re: Approval letter; Condition 3(b), November 2, 1999.

651.300.000228.TkrCplanCOA3.pdf

Carney, P. (2000, March 1) Patrick Carney, BPOSS on behalf of RPG, to Steve Provant, ADEC, re: Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan; Condition 3 Geographical Response Strategies Statement of Commitment, March 1, 2000.

651.300.000301.TkrPlancoa3.pdf

Carney, P. (2000, March 1) Patrick Carney, BPOSS on behalf of RPG, to S. Provant, ADEC, November 2, 1999 Approval letter; Condition 3(b), March 1, 2000.
651.300.00031.Tkrplancoa3b.pdf

Harvey, S. (2000, May 24), Susan Harvey, ADEC, to John Devens, PWS RCAC, "Geographical Response Strategy Memorandum of Agreement"
654.300.000524.ADECreGRSmoa.pdf

Haugstad, E. and Provant, S. (2000, October 31), Eric Haugstad and Steve Provant, Co-Chairs of GRS Work Group, to John Devens, PWS RCAC, Public Comments on Prince William Sound Geographic Response Strategies.
654.300.001031.TEScmntGRS.pdf

H.W. Yates (2000, May 25) H.W. Yates, SeaRiver Maritime, to Carol Ann Kompkoff, Chenega Bay IRA Council, "PWS GRS Exercise June 6-8, 2000"
654.300.000525.SeaRgrsExerc.pdf

Provant, S. (2000, March 3) Steve Provant, ADEC, to P. Carney, BPOSS, on behalf of RPG, re: Condition No. 3(a) and (e), March 3, 2000.
651.300.000303.ADECtkrCon3b.pdf

Provant, S. (2000, March 3) Steve Provant, ADEC, to P. Carney, BPOSS, on behalf of RPG, re: Condition No. 3(b), March 3, 2000.
651.300.000303.ADECtkr3a & e.pdf

Provant, S. (2000, March 20) Steve Provant, ADEC, to P. Carney, BPOSS, on behalf of RPG, Condition No. 3(b)
651.300.000320.ADECtkrCon3b.pdf

Provant, S. (2000, May 9) Steve Provant, ADEC, to P. Carney, BPOSS, on behalf of RPG, Condition No. 3(a)
651.300.000509.ADECcond3GRS.pdf

Provant S. (2001, July 3) Steve Provant, ADEC, to Thomas Colby, Alaska Tanker Company, Response Planning Group re: Reply to your GRS letter of June 19, 2001, July 3, 2001.
654.300.010703.ADECGRSwkgrp.pdf

PWS GRS Workgroup. (2000) Memorandum of Agreement
654.590.000511.PWSGRSmoa.pdf

PWS GRS Workgroup, (2000) List of Candidate Sites Preliminarily Selected for Geographical Response Strategy Development by PWS GRS Work Group.
654.109.000915BMgrsCandSit

PWS GRS Workgroup. (2001) Comments Summary on PWS GRS Work Group September/October 2001 Public Input Process.
654.410.011016.GRSpubInputRpts.pdf

Prince William Sound Regional Citizens' Advisory Council. (2001) Geographic Response Strategies (GRS) Information Packet.
654.431.010913.GRSFolderRFI.pdf

Williams, J., (2001, May 30) Jeff Williams, Chevron Shipping Co, LLC to John Devens, PWS RCAC, re: Chevron GRS 2001 Exercise Site Selection, May 30, 2001.
654.300.010530.ChevExercise.pdf

2000 Major Amendment re Fishing Vessel program (1999 COA 6)

Plan holders:
Alaska Tanker Co., ARCO Marine, Inc., Chevron Shipping Co., SeaRiver Maritime Inc., Tesoro Alaska Petroleum Co.

Summary:
The 1999 plan approval included COA 6, a requirement that the plan holders would 1) modify and update fishing vessel spill response training; 2) submit a plan amendment providing the arrangements to enable the plan holders to inspect, select, and contract Tier III vessels; and 3) provide an updated inventory of Tier I and II contracted vessels to ADEC on a quarterly basis.

On December 30, 1999, the RPG submitted a proposed minor amendment to satisfy COA 6. A notebook of fishing vessel training materials was made available for ADEC inspection at the SERVS Fishing Vessel Coordinator's Valdez office. Tier III Fishing Vessel Activation Procedures were established and included in the amendment. Finally, Alyeska provided to ADEC an updated list of contracted fishing vessels.

Following correspondence between ADEC and the plan holders to clarify the intent of the COA, on February 28, 2000, ADEC determined that the information provided, including the proposed amendment language, satisfied the intent of condition. ADEC determined that the amendment had to be treated as a major amendment and would proceed through the formal public review process. On March 3, 2020, the RPG submitted the formal amendment package to ADEC.

On June 16, 2000, ADEC issued a proposed consistency determination and findings for approval of plan edits to satisfy 1999 COA 6 improvements for fishing vessel responders. On June 22, 2000, ADEC approved the amendment to the plan with the additional provisions to improve fishing vessel response.

Supporting Documents:

Carney, P. (1999, December 30) Patrick Carney, BPOSS on behalf of RPG, to Steve Provant, ADEC, re: November 2, 1999 Approval Letter, Condition 6 (1) – Fishing Vessel Training, December, 30, 1999.
651.300.991230.TkrCoa61.pdf

Carney, P. (1999, December 30) Patrick Carney, BPOSS on behalf of RPG, to Steve Provant, ADEC, re: November 2, 1999 Approval Letter, Condition 6 (2) – Tier III Fishing Vessel Activation Procedures, December 30, 1999.
651.300.991230.BPCondtion6(2)TierIIIActivationProcedures.pdf

Carney, P. (2000, February 11) Patrick Carney, BPOSS on behalf of RPG, to Steve Provant, ADEC, re: November 2, 1999 Approval Letter, Condition 6 – Fishing Vessel Training Ref February 4, 2000 Letter, February 11, 2000.
651.300.000215.ADECTkrCplnCond6.pdf

Harvey, S. (2000, June 16) Susan Harvey, ADEC, to William Rogers, Chevron Shipping Company, LLC, re: Proposed Consistency Determination for Amendment to Chevron Shipping Company, LLC Oil Discharge Prevention and Contingency Plan, ADEC Number 981-CP-4044, June 16, 2000.
651.300.000616.ADECchevrTkr.pdf

Harvey, S (2000, June 22) Susan Harvey, ADEC, to John A. Ripperger, Alaska Tanker Company, LLC, re: Plan Amendment to Alaska Tanker Company, LLC, Oil Discharge Prevention and Contingency Plan dated July 22, 1998 as amended, ADEC Plan Number 981-CP-4039, June 22, 2000.
651.300.000622.ADECtkrFVRsp.pdf

Hillman, S. (1999, December 30) Sharon Hillman, Alyeska Pipeline Service Company on behalf of RPG, to Steve Provant, ADEC, re: November 2, 1999 Approval Letter, Condition 6 (3) – Tier I, II & III Vessel Inventories, December 30, 1999.
651.300.991230.TkrCoa63APSC.pdf

Provant, S. (2000, February 4) Steve Provant, ADEC, to Patrick Carney, BPOSS on behalf of RPG, re: Condition of Approval #6, February 4, 2000.
651.300.000204.ADECtkrCOA6.pdf

Provant, S. (2000, February 28) Steve Provant, ADEC, to Patrick Carney, BPOSS on behalf of RPG, re: Condition of Approval # 6, February 28, 2000.
651.300.000228.ADECtkrCOA6.pdf

2000 Minor Amendment re: Near Shore Secondary Storage Barges (1999 COA 5)

Plan holders:
Alaska Tanker Co., ARCO Marine, Inc., Chevron Shipping Co., SeaRiver Maritime Inc., Tesoro Alaska Petroleum Co.

Summary:
The 1999 plan approval included COA 5, a requirement that the plan holders demonstrate access to five secondary storage barges to support nearshore response operations.

On December 30, 1999, the RPG sent a letter to ADEC as required by 1999 COA 5(a) and (b) providing Contract TAPS/6140, a memorandum of understanding between Crowley Marine Services, Inc. and Alyeska Pipeline Service Company in which Crowley agreed to make available one barge at the scene of a cleanup by hour 71 of the spill response and two additional barges by day nine and two additional barges by day eleven. The barges were to be outfitted with suitable mooring connections, fenders, pumps, hoses and equipment to position pumps that will allow successful lightering from multiple mini-barges or small storage containers. If Crowley is not able to provide such barges, it must make best efforts to obtain suitable barges from third-party sources. Attachment 1 was a listing of the 10 barges in Crowley's fleet.

ADEC responded on February 7, 2000, stating that proviso in the MOU that "if commercially available" did not ensure availability of the needed barges. ADEC stated "The contract must clearly state that financial terms have been previously negotiated with the provider, and will not result in a delay in meeting the 71-hour planning standard. Details of the negotiated rate structure do not need to be submitted to the Department; rather, the Department simply requires that the contract clearly state that a rate structure is currently in place. A third option would be to develop a mutual aid agreement with a local spill response organization, such as CISPRI."

The RPG responded on February 18, 2000, stating they believed their submittal satisfied COA 5 and asserted that ADEC was expanding on its intention on Condition 5 and provided additional information on the CISPRI Mutual Aid Agreement, the memorandum of understanding concerning charter rates in the TAPS/6140 contract with Crowley and equipment for outfitting secondary storage barges.

ADEC responded on February 28, 2000, stating that the first part of the condition had been satisfied but that the capacity to outfit the barges in 5(a) and 5(b) for lightering operations had not been satisfied.

RPG submitted letters dated March 15 and 16 with information planned to be used on the secondary storage barges for days 6 and 11 and information on transportation and deployment time estimates.

ADEC responded on April 21, 2000, finding that the information on the equipment planned to be used on the secondary storage barges to be acceptable. ADEC rejected the 2-hour timeframe for equipment to be expected to arrive in Anchorage from location in Alaska and from the West Coast. ADEC requested that the timeframes in this table be re-evaluated and submitted to ADEC for review.

On September 7, 2000, ADEC approved, as minor amendments, a July 6, 2000 plan amendment to Part 3, SID #1 – Operations, page 1-62 and SID # 2, Section 4 – Mutual Aid Agreement, page 4-3 of the PWS Tanker Oil Discharge Prevention and Contingency Plan (Core Plan), Second Edition, Rev. 0 (November 1999). The amendments provided for examples of equipment for storage barges of opportunity for offloading stations and added the Mutual Aid/Response Agreement between Alyeska and Cook Inlet Spill Prevention and Response, Inc. This action closed out the actions required by 1999 COA 5.

Supporting Documents:

Carney, P. (1999, December 30) Patrick Carney, BPOSS on behalf of RPG, to S. Provant, ADEC, November 2, 1999 Approval Letter, Condition 5 (a) and (b) – Secondary Storage Nearshore Response Plan
651.300.991230.TkrCoa5ab.pdf

Provant, S. (2000, February 7) Steve Provant, ADEC to Patrick Carney, BPOSS on behalf of RPG, Condition 5
651.300.000207.ADECtkrCoa5.pdf

Carney, P (2000, February 18) Patrick Carney, BPOSS on behalf of RPG, to S. Provant, ADEC, November 2, 1999 Approval Letter, Condition 5 – Nearshore Secondary Storage Ref February 7, 2000 Letter
651.300.000218.TkrCplnCoa5.pdf

Provant, S. (2000, February 28) Steve Provant, ADEC to Patrick Carney, BPOSS on behalf of RPG, Condition of Approval #5
651.300.000228.ADECtkrCOA5.pdf

Carney, P. (2000, March 15 and 16) Patrick Carney, BPOSS on behalf of RPG, to S. Provant, ADEC, November 2, 1999 Approval Letter, Condition 5 Ref February 28, 2000
651.300.000316.BPtkrCond5.pdf

Provant, S. (2000, April 21) Steve Provant, ADEC to Patrick Carney, BPOSS on behalf of RPG, PWS Tanker Oil Discharge Prevention and Contingency Plan, November 2, 1999 Approval Letter, Condition No. 5
651.300.000421.ADECtkrCOA5.pdf

Provant, S. (2000, September 7) Steve Provant, ADEC to Patrick Carney, BPOSS on behalf of RPG, Condition #5 Plan Revisions Approval 9-7-00

651.300.000907.ADECtkrPt3Rv.pdf

2000 Minor Amendment re respirator training (1999 COA 7)

Plan holders:
Alaska Tanker Co., ARCO Marine, Inc., Chevron Shipping Co., SeaRiver Maritime Inc., Tesoro Alaska Petroleum Co.

Summary:
The 1999 plan approval included COA 7, a requirement for respirator training to 18 Tier I fishing vessel crews.

On February 22, 2000, the RPG provided plan amendments for Fishing Vessel Training requirements, a statement that APSC/SERVS will provide respirator training for 18 fishing vessel crews, noting that documentation of respirator training will be maintained in the fishing vessel database at APSC/SERVS, and providing for semi-annual additional training to be conducted for replacement crews, if necessary.

On February 28, 2000, ADEC accepted the procedures in the RPG's February 22, 2000 letter, including the amendment language, a meeting COA 7.

On March 1, 2000, the RPG then provided copies of the routine plan update to plan reviewers and ADEC approved the text changes to the plan as a routine plan update on March 20, 2000.

In a letter dated, May 31, 2000, ADEC found the planholders had satisfied 1999 COA 7 after ADEC's review of respirator fit testing training records and the establishment of documentation procedures for listing the information in SERVs fishing vessel database.

Supporting Documents:

Carney, P. (2000, February 22) Patrick Carney, BPOSS on behalf of RPG, to S. Provant, ADEC, PWS Tanker Oil Discharge Prevention and Contingency Plan, Ref November 2, 1999 Approval Letter, Condition 7 – Fishing Vessel Training Requirements
651.300.000222.TkrCplnCoa7.pdf

Provant, S. (2000, February 28) Steve Provant, ADEC, to Patrick Carney, BPOSS on behalf of RPG, Condition of Approval # 7
651.300.000228.ADECtkrCOA7.pdf

Carney, P. (2000, March 1) Patrick Carney, BPOSS on behalf of RPG, to PWS Plan Reviewers, Routine Plan Updates for Condition 7
651.300.000301.TkrCplanCoa7.pdf

Provant, S. (2000, March 20) Steve Provant, ADEC, to Patrick Carney, BPOSS on behalf of RPG, Condition of Approval # 7

651.300.000320.ADECtkrCond7.pdf

Provant, S. (2000, May 31) Steve Provant, ADEC, to Patrick Carney, BPOSS on behalf of RPG, Condition of Approval # 7
651.300.000531.ADECbptkrCo7.pdf

2000 Reporting of Tanker Casualties (1999 COA 9)

Plan holders:
Alaska Tanker Co., ARCO Marine, Inc., Chevron Shipping Co., SeaRiver Maritime Inc., Tesoro Alaska Petroleum Co.

Summary:
The 1999 plan renewal included COA 9 which specified reporting requirements for vessels involved in a reportable incident along the TAPS trade route.

On November 9, 1999, the RPG send a letter to ADEC posing specific clarification questions concerning the 1999 COAs, including the reporting requirements of 1999 COA 9.

In their December 1999 adjudicatory hearing requests and request for a stay of 1999 COA 3, 4, 7, and 9, BP Oil Shipping, ARCO Marine, and SeaRiver Maritime argued that COA 9 was pre-empted by US Coast Guard reporting regulations, and was broad and unclear in scope.

On December 16, 1999, ADEC sent the RPG a clarification letter on the reporting requirements of COA 9. The letter identified what is included in Notification of Vessel Casualty, who must report, what is included as an Incident, what is a vessel casualty, what type of reporting is required and what are the time requirements, what is required in the report, and what are Alaska waters. In March 2000, the Plan holders withdrew their challenge to 1999 COA 9 as part of their adjudicatory hearing request.

Supporting Documents:

ARCO Marine Inc., BP Oil Shipping Company, USA, and SeaRiver Maritime. (1999) Motion for Stay of Enforcement of Condition 3, Condition 4, Condition 7 and Condition 9 to the Oil Spill Contingency Plan Approval Dated November 2, 1999.
651.110.991202.TkrCplStayOr.pdf

ARCO Marine Inc., BP Oil Shipping Company, USA, and SeaRiver Maritime. (1999) Memorandum in Support of Motion for Stay of Enforcement of Condition 3, Condition 4, Condition 7 and Condition 9 to the Oil Spill Contingency Plan Approval Dated November 2, 1999.
651.110.991202.TkrStaySuppo.pdf

Carney, P. (1999, November 9) Patrick Carney, BPOSS on behalf of RPG, to Susan Harvey, ADEC, PWS Tanker Oil Discharge Prevention and Contingency Plan, Ref: November 2, 1999 Approval Letter(s)
651.300.991109.TkrCertQues.pdf

Provant, S. (1999, December 16) Steve Provant, ADEC, to Patrick Carney, BPOSS on behalf of RPG, re: Condition #9 clarification, December 16, 1999.

651.300991216.ADECtkrCOA9.pdf

2000 Scenario Workgroup (1999 COA 4)

Plan holders:
Alaska Tanker Co., ARCO Marine, Inc., Chevron Shipping Co., SeaRiver Maritime Inc., Tesoro Alaska Petroleum Co.

Summary:
The 1999 plan renewal approval included COA 4 which required that the plan holders participate in a scenario workgroup to be co-chaired by ADEC and the plan holders. Draft scenarios were to be submitted by February 1, 2001, and final scenarios by February 1, 2002, as part of the 2002 plan renewal application.

The 1995 Tanker plan included "Scenario B" as a worst-case discharge scenario. ADEC approved, and PWSRCAC supported, Scenario B which was based on reasonable worst-case assumptions. In the 1998 Tanker Plan, the plan holders significantly reformatted the Scenario, replacing a narrative format with a table based on regulatory requirements. The plan holders eventually submitted Scenario B to supplement the worst-case discharge table. Concurrent with the 1998 plan review, PWSRCAC funded an analysis of the worst-case discharge scenario to highlight some of the resource issues and recommend a more effective process for developing scenarios in the future. The scenario analysis used the Incident Action Plan framework to analyze the resource requirements for all task forces and strike teams deployed, and then match the resources ordered with these functional requirements. The results of this analysis identified several shortcomings and recommended using an IAP process to develop future scenarios.

1999 COA 4 sought to establish a scenario workgroup including the PWSRCAC to further improve the scenarios in the plan. On November 22, 1999, ADEC responded to the RPG's questions concerning the conditions of approval, and with respect to 1999 COA 4 stated that ADEC would like the scenario development process to be efficient. In addition to ADEC and an RPG designee, the USCG Valdez, SERVS and the PWSRCAC were invited to be members of the scenario workgroup. Other agencies, such as ADF&G were included to address wildlife or other issues as needed.

On March 1, 2000, the RPG sent ADEC a letter stating that the plan holders agree to participate in a work group to discuss scenario development for the plan in accordance with 18 AAC 75.425(e)(1)(F). Compliance constituted plan holders writing and delivering draft scenarios to ADEC on or before February 1, 2001, with final scenarios to be part of the 2002 plan renewal application.

The Condition 4 scenarios workgroup was initiated on October 23, 2000, at an ADEC meeting. At the meeting, ADEC proposed new content and format for the PWS and Valdez Marine Terminal plan scenarios.

On February 1, 2001, the RPG submitted a new draft scenario as required by 1999 COA 4. The letter included a table discussing ADEC's October 13, 2000, guidance and how its draft submittal responded to the guidance with a draft SID #4 Section 1 Scenario 809 "describing a response to a hypothetical 809,080-barrel spill." The scenario formats included a timeline table, resource mobilization table, equipment tally, organization charts, and a regulatory compliance table.

On May 7, 2001, Steve Provant of ADEC provided guidance to the RPG on the number of nearshore fishing vessel task forces that needed to be included in the response scenarios to satisfy COA 4. ADEC intended that the revisions to the scenarios continue to include the planning for five in-region, three out-of-region and eleven post-72-hour nearshore task forces. The scenario planning was to address the potential for a change in the spill from an open water response to a nearshore response. ADEC stated that the change in the realistic maximum oil discharge from 950,000 barrels to 809,000 barrels did not provide justification for a reduction in the number of nearshore task forces that must be planned for in the scenarios.

In a May 30, 2001, teleconference, the RPG provided additional scenario materials. Joe Banta of PWSRCAC provided comments to John Kotula, ADEC, and Tom Colby, RPG, on the February 1, 2001, Draft Scenario and the PWS Tanker Plan Scenario Handouts.

The scenario went through an RFAI process and on August 19, 2001, RCAC submitted formal comments on the RPG's RFAI Responses.

The final scenarios were incorporated into the plan for the 2002 renewal.

Supporting Documents:

Robertson T., Jones, T., Hartley, B., and DeCola, E. (1999, June) to Prince William Sound Regional Citizens' Advisory Council, Analysis of Oil Spill Scenarios from the 1998 Prince William Sound Tanker Plan Using Incident Action Plan and Critical Path Methods
651.105.990601.TNKcplanAnalysis

Harvey, S (1999, November 22) Susan Harvey, ADEC to P. Carney, BPOSS on behalf of RPG, Response to November 9, 1999 Correspondence re: 1999 COAs
651.300.991122.DECtkrRPGrsp.pdf

Carney, P. (2000, March 1) Patrick Carney, BPOSS on behalf of RPG, to S. Provant, ADEC, November 2, 1999 Approval letter; Condition 4
651.300.000301.TkrCplanCOA4.pdf

Provant, S. (2000, March 3) Steve Provant, ADEC, to P. Carney, BPOSS, on behalf of RPG, Condition No. 4
651.300.000303.ADECtkrCond4.pdf

Colby, T. (2000, November 30) Thomas Colby, ATC, on behalf of RPG, to S. Provant, ADEC, November 2, 1999 Approval letter; Condition 4, Scenarios
651.300.001204.ADECtkrCond4.pdf

Carney, P. (2001, February 1) Patrick Carney, BPOSS on behalf of RPG, to S. Provant, ADEC, November 2, 1999 Approval letter; Condition 4
651.300.010201.TkrCoaATC.pdf

Provant, S. (2001, May 7) Steve Provant, ADEC, to P. Carney, Alaska Tanker Company, on behalf of RPG, Condition No. 4, Scenario Near Shore Task Forces
651.300.010507.ADECCOA4Shor.pdf

Robertson, T (2001, June 27) Tim Robertson, Tim Robertson Consulting, to Joe Banta, PWS RCAC, Analysis and Comments on recent submittal on PWS TP COA #4 Scenarios
651.109.010627.TRCOA4ScCmts.pdf

PWSRCAC, (2001, August 1) Comments Regarding RFAI Responses for 2002 Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan and Individual Tanker Company Oil Discharge Prevention and Contingency Plans
600.431.010819.CmtsPhldRFAIrsp.pdf

Robertson, T. (2001, October 5) Additional Comments on Scenario Work products to S. Maunder
651.105.011005.TRScen809Cmt.pdf

ADEC, (2001, November 1) Comments on SID #4 Section 1 Scenario 809
651.300.011101.ADEC809Cmts.pdf

Robertson, T. (2001, December 12) to Banta, J, PWS RCAC, Draft Comments on PWS TP Scenario 809
651.300.011212.TRcmtSID4Sc809.pdf

2000 Scenario Workgroup (1999 COA 4)

Plan holders:
Alaska Tanker Co., ARCO Marine, Inc., Chevron Shipping Co., SeaRiver Maritime Inc., Tesoro Alaska Petroleum Co.

Summary:
The 1999 plan renewal approval included COA 4 which required that the plan holders participate in a scenario workgroup to be co-chaired by ADEC and the plan holders. Draft scenarios were to be submitted by February 1, 2001, and final scenarios by February 1, 2002, as part of the 2002 plan renewal application.

The 1995 Tanker plan included "Scenario B" as a worst-case discharge scenario. ADEC approved, and PWSRCAC supported, Scenario B which was based on reasonable worst-case assumptions. In the 1998 Tanker Plan, the plan holders significantly reformatted the Scenario, replacing a narrative format with a table based on regulatory requirements. The plan holders eventually submitted Scenario B to supplement the worst-case discharge table. Concurrent with the 1998 plan review, PWSRCAC funded an analysis of the worst-case discharge scenario to highlight some of the resource issues and recommend a more effective process for developing scenarios in the future. The scenario analysis used the Incident Action Plan framework to analyze the resource requirements for all task forces and strike teams deployed, and then match the resources ordered with these functional requirements. The results of this analysis identified several shortcomings and recommended using an IAP process to develop future scenarios.

1999 COA 4 sought to establish a scenario workgroup including the PWSRCAC to further improve the scenarios in the plan. On November 22, 1999, ADEC responded to the RPG's questions concerning the conditions of approval, and with respect to 1999 COA 4 stated that ADEC would like the scenario development process to be efficient. In addition to ADEC and an RPG designee, the USCG Valdez, SERVS and the PWSRCAC were invited to be members of the scenario workgroup. Other agencies, such as ADF&G were included to address wildlife or other issues as needed.

On March 1, 2000, the RPG sent ADEC a letter stating that the plan holders agree to participate in a work group to discuss scenario development for the plan in accordance with 18 AAC 75.425(e)(1)(F). Compliance constituted plan holders writing and delivering draft scenarios to ADEC on or before February 1, 2001, with final scenarios to be part of the 2002 plan renewal application.

The Condition 4 scenarios workgroup was initiated on October 23, 2000, at an ADEC meeting. At the meeting, ADEC proposed new content and format for the PWS and Valdez Marine Terminal plan scenarios.

On February 1, 2001, the RPG submitted a new draft scenario as required by 1999 COA 4. The letter included a table discussing ADEC's October 13, 2000, guidance and how its draft submittal responded to the guidance with a draft SID #4 Section 1 Scenario 809 "describing a response to a hypothetical 809,080-barrel spill." The scenario formats included a timeline table, resource mobilization table, equipment tally, organization charts, and a regulatory compliance table.

On May 7, 2001, Steve Provant of ADEC provided guidance to the RPG on the number of nearshore fishing vessel task forces that needed to be included in the response scenarios to satisfy COA 4. ADEC intended that the revisions to the scenarios continue to include the planning for five in-region, three out-of-region and eleven post-72-hour nearshore task forces. The scenario planning was to address the potential for a change in the spill from an open water response to a nearshore response. ADEC stated that the change in the realistic maximum oil discharge from 950,000 barrels to 809,000 barrels did not provide justification for a reduction in the number of nearshore task forces that must be planned for in the scenarios.

In a May 30, 2001, teleconference, the RPG provided additional scenario materials. Joe Banta of PWSRCAC provided comments to John Kotula, ADEC, and Tom Colby, RPG, on the February 1, 2001, Draft Scenario and the PWS Tanker Plan Scenario Handouts.

The scenario went through an RFAI process and on August 19, 2001, RCAC submitted formal comments on the RPG's RFAI Responses.

The final scenarios were incorporated into the plan for the 2002 renewal.

Supporting Documents:

Robertson T., Jones, T., Hartley, B., and DeCola, E. (1999, June) to Prince William Sound Regional Citizens' Advisory Council, Analysis of Oil Spill Scenarios from the 1998 Prince William Sound Tanker Plan Using Incident Action Plan and Critical Path Methods
651.105.990601.TNKcplanAnalysis

Harvey, S (1999, November 22) Susan Harvey, ADEC to P. Carney, BPOSS on behalf of RPG, Response to November 9, 1999 Correspondence re: 1999 COAs
651.300.991122.DECtkrRPGrsp.pdf

Carney, P. (2000, March 1) Patrick Carney, BPOSS on behalf of RPG, to S. Provant, ADEC, November 2, 1999 Approval letter; Condition 4
651.300.000301.TkrCplanCOA4.pdf

Provant, S. (2000, March 3) Steve Provant, ADEC, to P. Carney, BPOSS, on behalf of RPG, Condition No. 4
651.300.000303.ADECtkrCond4.pdf

Colby, T. (2000, November 30) Thomas Colby, ATC, on behalf of RPG, to S. Provant, ADEC, November 2, 1999 Approval letter; Condition 4, Scenarios
651.300.001204.ADECtkrCond4.pdf

Carney, P. (2001, February 1) Patrick Carney, BPOSS on behalf of RPG, to S. Provant, ADEC, November 2, 1999 Approval letter; Condition 4
651.300.010201.TkrCoaATC.pdf

Provant, S. (2001, May 7) Steve Provant, ADEC, to P. Carney, Alaska Tanker Company, on behalf of RPG, Condition No. 4, Scenario Near Shore Task Forces
651.300.010507.ADECCOA4Shor.pdf

Robertson, T (2001, June 27) Tim Robertson, Tim Robertson Consulting, to Joe Banta, PWS RCAC, Analysis and Comments on recent submittal on PWS TP COA #4 Scenarios
651.109.010627.TRCOA4ScCmts.pdf

PWSRCAC, (2001, August 1) Comments Regarding RFAI Responses for 2002 Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan and Individual Tanker Company Oil Discharge Prevention and Contingency Plans
600.431.010819.CmtsPhldRFAIrsp.pdf

Robertson, T. (2001, October 5) Additional Comments on Scenario Work products to S. Maunder
651.105.011005.TRScen809Cmt.pdf

ADEC, (2001, November 1) Comments on SID #4 Section 1 Scenario 809
651.300.011101.ADEC809Cmts.pdf

Robertson, T. (2001, December 12) to Banta, J, PWS RCAC, Draft Comments on PWS TP Scenario 809
651.300.011212.TRcmtSID4Sc809.pdf

2001 Major Amendment re Hinchinbrook Entrance Tug (1999 COA 8)

Plan holders:
Alaska Tanker Co., ARCO Marine, Inc., Chevron Shipping Co., SeaRiver Maritime Inc., Tesoro Alaska Petroleum Co.

Summary:
The 1999 plan approval included COA 8 which required that the plan holders conduct simulation and sea trials for Hinchinbrook Entrance tanker escort operations to assess the plan holder's July 28, 1999, proposal for a change to the Hinchinbrook Entrance escort operations.

In December 1999, the State of Alaska, BP Exploration Alaska, and ARCO Alaska entered into a Charter for Development of the Alaskan North Slope in order for the State of Alaska to approve the sale of ARCO Alaska to BP (State of Alaska, et. al., 1999). In Section B of the Charter, Marine Environmental Commitments, BP and ARCO agreed to continue to support a ship escort response vessel system for PWS at current or better levels of effectiveness.

On December 10, 1999, BP Oil Shipping wrote the ADEC Commissioner confirming support for the escort system in PWS and pledging to ensure that it remained world class. BP Oil Shipping noted that before newly built tugs could be integrated into the escort system, tests and sea trials needed to be completed. The letter also stated that in addition to training, the sea trials would be used to collect data to use to model a tanker arrest in closure conditions in Hinchinbrook Entrance.

On December 30, 1999, the RPG submitted a study conducted by The Glosten Associates, Inc. that calculated worst-case drift trajectories for tankers in PWS as part of 1999 COA 8. On January 14, 2000, PWSRCAC wrote a letter to ADEC stating that they did not feel that the study submitted by the RPG represented the worst-case drift trajectories. ADEC replied to the RPG by noting that they had not met the requirement of COA 8 to submit input parameters to ADEC for review before running the simulations. ADEC requested a meeting of all stakeholders (including PWSRCAC) to review and approve input parameters to expedite compliance with 1999 COA 8. The meeting was held on February 22, 2000.

On February 28, 2000, the RPG sent ADEC a letter documenting the input parameters discussed at the meeting and asserting that the submittal of December 30, 1999, met the requirements of COA 8. Nuka Research did not identify a record of ADEC responding to this letter, but the outcome was that the RPG performed additional drift trajectory simulations with results submitted in April and June that year.

On February 25, 2000, Alyeska asked for PWSRCAC's support to release the Gulf Service from Hinchinbrook escort duties to be replaced with a Prevention Response Tug (PRT). On March 17, PWSRCAC replied to Alyeska stating that they felt the release of the Gulf Service at that time was contrary to the process required by COA 8. PWSRCAC urged Alyeska and the RPG to

follow the process described in 1999 COA 8, which would eventually lead to the release for the Gulf Service once simulations and sea trials were completed, but not before. Three PRTs were placed into escort service in the spring and summer of 2000, even as the COA 8 process continued to unfold.

On March 14, 2000, a towing exercise was conducted in PWS using an Enhanced Tractor Tug (ETT) and PRT to tow a 261,000 DWT crude oil tanker. The purpose of the exercise was to practice and improve techniques for the rescue of a disabled tanker. The Glosten Associates, Inc. evaluated test data from the exercise and found that the ETT exceeded performance requirements of the 1997 RFP.

On March 22, 2000, the RPG sent a letter to ADEC recommending criteria for additional worst-case trajectory simulations. On March 31, ADEC affirmed the simulation criteria and requested that the RPG meet with ADEC and PWSRCAC to review the results and see if additional simulations were warranted. Once the simulations were complete, tug maneuvers would be identified and tested through sea trials. Once proven, the tug maneuvers would be incorporated into the simulations.

Also, on March 22, 2000, the RPG submitted an amendment to the plan to request a determination that the PRT Alert was equivalent to the Gulf Service and, therefore, the PRT could be substituted as the Hinchinbrook escort. On April 14, 2000, ADEC determined the proposed amendment sufficient for public review. On August 4, ADEC issued a proposed consistency determination and draft approval for the amendment.

On June 28, 2000, ADEC wrote a letter to the RPG indicating that they had reviewed the submitted trajectory simulations and were ready to bring the trajectory simulations to a close and begin considering tug maneuvers for tanker arrest and sea trials. On July 13, the RPG submitted the final worst-case trajectory simulations and tug maneuvers in a letter to ADEC. On August 2, PWSRCAC sent ADEC a letter stating that they did not feel that the July 13 submittal contained enough detail to meet the requirements of COA 8.

On August 14, 2000, The Glosten Associates, Inc. issued a report on drift simulations in Hinchinbrook Entrance. The report contained a series of simulations of different scenarios of ETT and PRT assisting a 211,000 DWT tanker in Hinchinbrook Entrance at closure conditions.

On September 1, 2000, the RPG submitted a letter and package of information that they believed demonstrated that all requirements of 1999 COA 8 had been met. On September 11, PWSRCAC's project team met with ADEC and USCG to discuss their concerns with the RPG's submittal.

On October 4, the RPG submitted another Tanker C-plan amendment that included the information submitted on September 1, and language for a revised BAT section in the plan. On November 17, ADEC notified the RPG that the proposed amendment submitted on October 4 was not sufficient for review because the amendment did not reflect the then-current escort fleet.

On December 8, the RPG submitted a revised text for the proposed plan amendment. On December 21, ADEC indicated that additional information was needed before the plan could be submitted for public review. In this letter, ADEC also informed the RPG that they would require a sea trial in less-than-calm conditions to verify the simulations.1

On January 10, 20012, the Tanker C-plan holders provided a letter to ADEC with answers to the questions ADEC had raised in their letter of December 21.

On November 14, 2000, PWSRCAC asked the RPG to conduct a drift stop exercise to validate the simulations done for worst-case trajectories. On January 9, 2001, the RPG declined to conduct the exercise on the basis it would be a disruption and distraction, and would elevate risk of an incident.

In March 2001, The Glosten Associates, Inc. produced a final report on ETT Radio Controlled Model Tests. This report contains the results of model tests to study the behaviors of the ETT in escort situations. These tests inform the development of rescue maneuvers.

In July, The Glosten Associates, Inc. produced a final report on their SHIPMAN maneuvering simulations of tanker escort tugs including ETT, PRT, and Protector. This report included computer simulations of escort tug interventions in disabled tanker scenarios to aid in determining the appropriate substitution of escort tugs in Valdez Narrows and Valdez Arm.

On April 6, 2001, ADEC issued the RPG a notice to publish a Tanker C-plan amendment for public review, which was then published on April 16. On August 2, ADEC issued a proposed consistency determination and draft approval of the C-plan amendment to satisfy 1999 COA 8. On August 15, 2001, ADEC notified the RPG that the amendment was approved, confirming that the escort system met the State's BAT requirements.

Supporting Documents:

State of Alaska, BP, and ARCO. (1999). Charter Agreement for Development of the Alaskan North Slope. December 2.

British Petroleum Oil Shipping Company (BP). (1999). Letter to Commissioner Michele Brown, ADEC. Confirming Support of Ship Escort and Response System. Anchorage, AK. December 10.
651.300.991210.BPtkrPRTadds.pdf

Response Plan Group (RPG). (1999c). Letter to Steve Provant, ADEC. PWS Tanker Discharge Prevention and Contingency Plan: November 2, 1999 Approval Letter, Condition 8 Hinchinbrook Escort BAT Assessment. Anchorage, AK. December 30.
651.300.991230.TkrCoa8BAT.pdf

Prince William Sound Regional Citizen's Advisory Council (PWSRCAC). (2000a). Letter to Steve Provant, ADEC. PWS Tanker C-Plan, Condition of Approval No. 8, Hinchinbrook Escort BAT. Valdez, AK. January 14.
651.105.00014.TKRcoa8Sims.pdf

Alaska Department of Environmental Conservation (ADEC). (2000a). Letter to Patrick J. Carney, BP Oil Shipping Company, USA. Condition No. 8. Anchorage, AK. February 7.
651.300.000207.ADECtkrCond8.pdf

Response Plan Group (RPG). (2000a). Letter to Steve Provant, ADEC. PWS Tanker Discharge Prevention and Contingency Plan: November 2, 1999 Approval Letter, Condition 8 (1)(a). Anchorage, AK. February 28.
651.300.000228.BPtkrCond81a.pdf

The Glosten Associates, Inc. (2000a). Simulations Hinchinbrook Entrance. Prepared for the Disabled Tanker Towing Study Group. Anchorage, AK. May.

The Glosten Associates, Inc. (2000b). Hinchinbrook Simulation Results. Prepared for the Disabled Tanker Towing Study Group. Anchorage, AK. June.

Alyeska Pipeline Service Company (APSC). (2000). Letter to John Devens, Prince William Sound RCAC. PRT Replacement of the Gulf Service. Valdez, AK. February 25.
651.300.000225.APSCtkrGulfS.pdf

Prince William Sound Regional Citizen's Advisory Council (PWSRCAC). (2000b). Letter to Dan Hisey, Alyeska Pipeline Service Company. PWS Tanker C-Plan, Condition of Approval No. 8, Gulf Service Release. Valdez, AK. March 17.
651.105.000317.RCACGulfHold.pdf

Jones, T. (2000). Alert/Nanuq Towing Exercise Preliminary Report. Prepared for PWSRCAC Oil Spill Prevention and Response Committee. March 15.
752.431.000315.AlexTowEx.pdf

United States Coast Guard (USCG). (2000). Alert/Nanuq Towing Exercise Summary. Valdez, AK. March 14.

The Glosten Associates, Inc. (2000c). Verification of VSP tugs Nanuq and Tan'erliq performance with respect to PWS RFP. April 4.

Response Plan Group (RPG). (2000b). Letter to Steve Provant, ADEC. PWS Tanker Discharge Prevention and Contingency Plan: November 2, 1999 Approval Letter, Condition 8, February 7, 2000 and March 20, 2000. Anchorage, AK. March 22.
651.300.000322.BPtkrCond8.pdf

Alaska Department of Conservation (ADEC). (2000b). Letter to Patrick J. Carney, BP Oil Shipping Company, USA. PWS Tanker Oil Discharge Prevention and Contingency Plan, November 2, 1999 Approval Letter, Condition No. 8(1)(2)(3). Anchorage, AK. March 31.

Response Plan Group (RPG). (2000c). C-Plan Vessel Equivalency Report. March.
651.300.000322.BPVessEquRpt.pdf

Alaska Department of Conservation (ADEC). (2000c). Letter to Patrick J. Carney, BP Oil Shipping Company, USA. Amendment to the ADEC Approval of the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plans: Notice to Publish. Anchorage, AK. April 14.
651.300.000414.ADECcplanPbl.pdf

Alaska Department of Conservation (ADEC). (2000d). Letter to William C. Rogers, Chevron Shipping Company, LLC. Proposed Consistency Determination for Amendment of the ADEC November 2, 1999 Approval of the Chevron Shipping Company. LLC, Oil Discharge Prevention and Contingency Plan date July 6, 1998 as Amended. ADEC No. 981-CP-4044. Anchorage, AK. August 4.
651.300.000804.ADECtkrChevr.pdf

Alaska Department of Conservation (ADEC). (2000e). Letter to Patrick J. Carney, BP Oil Shipping Company, USA. Worst Case Tanker Trajectories. Anchorage, AK. June 28.
651.300.000628.ADECtkrTraje.pdf

Response Plan Group (RPG). (2000d). Letter to Steve Provant, ADEC. PWS Tanker Discharge Prevention and Contingency Plan: November 2, 1999 Approval Letter and June 28, 2000 Letter regarding Condition 8 (1) Hinchinbrook Escort BAT Assessment. Anchorage, AK. July 13.
651.300.000713.ADECbpTraj.pdf

Prince William Sound Regional Citizen's Advisory Council (PWSRCAC). (2000c). Letter to Steve Provant, ADEC. July 13, 2000 Planholder Letter regarding Condition of Approval No. 8, 1. (COA 8,1.): Analysis of Trajectories. Valdez, AK. August 2.
651.105.000802.TkrCPlanCOA8.pdf

The Glosten Associates, Inc. (2000d). Shipman Drifting Simulations Cape Hinchinbrook Entrance. August 14.

Response Plan Group (RPG). (2000e). Letter to Steve Provant, ADEC. PWS Tanker Discharge Prevention and Contingency Plan: November 2, 1999 Approval Letter, Condition 8 (1) Hinchinbrook Escort BAT Assessment. Anchorage, AK. September 1.
651.300.000901.PWStnkplanBP.pdf

Prince William Sound Regional Citizen's Advisory Council (PWSRCAC). (2000d). C-Plan Project Team Meeting with ADEC re: Shippers COA 8 submittal. September.

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651.003.000911.ADECptMtgNot.pdf

Response Plan Group (RPG). (2000f). Letter to Steve Provant, ADEC. PWS Tanker Discharge Prevention and Contingency Plan: November 2, 1999 Approval Letter and September 25, 2000 Letter regarding Condition 8 (1) Hinchinbrook Escort BAT Assessment. Valdez, AK. October 4.
651.300.001004.TkrCoa8ATC.pdf

Alaska Department of Conservation (ADEC). (2000f). Letter to Thomas T. Colby, Prince William Sound Contingency Plan Holders. Condition of Approval No. 8 Final Report and Amendment to Prince William Sound Tanker Oil Discharge Prevention and Contingency Plans Approved November 2, 1999. Anchorage, AK. November 17.
651.300.001117ADECtkrCOA8.pdf

Response Plan Group (RPG). (2000g). Letter to Steve Provant, ADEC. PWS Tanker Discharge Prevention and Contingency Plan: November 2, 1999 Approval Letter, Condition 8, BAT and November 17, 2000 ADEC Letter. Valdez, AK. December 8.
651.300.001208.TkrCoa8ATC.pdf

Alaska Department of Conservation (ADEC). (2000g). Letter to Thomas T. Colby, Prince William Sound Contingency Plan Holders. Condition of Approval No. 8 to Prince William Sound Tanker Oil Discharge Prevention and Contingency Plans Approved November 2, 1999. Anchorage, AK. December 21.
651.300.001221.ADECCOA8.pdf

Response Plan Group (RPG). (2000h). Letter to Steve Provant, ADEC. PWS Tanker Discharge Prevention and Contingency Plan: November 2, 1999 Approval Letter, Condition 8, BAT and December 21, 2000 ADEC Letter. Valdez, AK. January 10.
651.300.000110.ATCtkrCoa8.pdf

Prince William Sound Regional Citizen's Advisory Council (PWSRCAC). (2000e). Letter to Tom Colby, Response Plan Group Coordinator. Drift Stop Tanker Exercise. Valdez, AK. November 14.
651.105.001114.TkrDriftStop.pdf

Response Plan Group (RPG). (2001a). Letter to John Devens, Prince William Sound RCAC. Drift Stop Tanker Exercise. Valdez, AK. January 9.

The Glosten Associates, Inc. (2001a). Report of Results from Crowley Alaska
ETT Nanuq/ Tan'erliq Radio Controlled Model Tests. Prepared for Crowley Marine Services, Inc. Seattle, WA. March.

The Glosten Associates, Inc. (2001b). Report of Results from Crowley Alaska ETT Nanuq/ Tan'erliq Radio Controlled Model Tests. Prepared for Crowley Marine Services, Inc. Seattle, WA. July.

Alaska Department of Conservation (ADEC). (2001a). Letter to Thomas T. Colby, Prince William Sound Contingency Plan Holders. Consideration of the Prince William Sound Escort System Best Available Technology (BAT) Assessment: Notice To Publish. Anchorage, AK. April 6.

Response Plan Group (RPG). (2001b). Public Notice Letter to Plan Reviewers and Interested Parties. PWS Tanker Discharge Prevention and Contingency Plan: Proposed Plan Amendment. Valdez, AK. April 16.
651.410.010416.TkrCPIPropAm.pdf

Alaska Department of Conservation (ADEC). (2001b). Letter to Thomas T. Colby, PWS Response Planning Group. Proposed Consistency Determination for Amendment of ADEC's November 2, 1999 Approval of five Prince William Sound Tanker Oil Discharge Prevention and Contingency Plans. Anchorage, AK. August 2.
651.300.010802.ADECAPRVCP.Pdf

Alaska Department of Environmental Conservation (ADEC). (2001c). Letter to Thomas T. Colby, PWS Response Planning Group. Conclusive Consistency Determination for Amendment of ADEC's November 2, 1999 Approval of five Prince William Sound Tanker Oil Discharge Prevention and Contingency Plans. Anchorage, AK. August 15.
651.300.010815.DECodpcpRPG.pdf

2002 Renewal

Plan holders:
Alaska Tanker Co, ChevronTexaco Shipping Co., Polar Tankers, Inc., SeaRiver Maritime, Inc., Tesoro Petroleum Co.

Summary:
Still operating under the 3-year approval period for state plans, a new plan was required following the 1998 submittal (approved in 1999) in 2001. This plan renewal was the last on the 3-year cycle as plan approvals were extended to 5 years beginning 2003. The PWS Plan consisted of two volumes: Volume 1 consisted of Part 1 – Response Action Plan and Part 2 – Prevention Plan (191 pages) and Volume 2 consisted of Part 3 - Supplemental Information Documents and Part 4 – Best Available Technology (691 pages).

There were no Conditions of Approval issued with the 2002 plan approval (not even the ones that later became standard administrative items, though the commitment to check fishing vessel availability quarterly is stated in the plan itself).

ADEC's findings accompanying the 2002 approval concluded several issues ongoing since the 1999 plan review (or previously).

- ADEC stated that verifying a plan holder's access to out-of-region equipment necessary to meet the RPS requires periodic review. An Out of Region Response Equipment Acquisition Survey was required as part of this plan review, resulting in ADEC concluding that the requirements were met. ADEC required that plan holders include "Equipment Access Agreements" flowcharts in their plans.
- Scenarios are adequate to describe a full response activation and serve as a usable guide – these were developed through a workgroup process beginning with the 1999 COA 4. As a result of that effort, the scenario formats were also modified to include a timeline table, resource mobilization table, equipment tally, org charts, and a regulatory compliance table. Specific activities in "downstream" communities are not addressed, as these, along with sensitive area protection more broadly, would come later in the response and the scenarios should not speculate on exactly where they would occur.
- Nearshore response task forces are adequately staffed (specifics from the plan are included in the Findings).
- Personnel numbers are adequate. During the review, ADEC required the designation of Command Staff by SERVS position.
- Tanker inspections conducted by the Coast Guard are sufficient to meet state regulations
- Tanker security plans are adequate even if not detailed (too much detail would undermine them; though ADEC asked for more information on deck watches).
- The escort system is BAT. Some of the information from the VERP must be included in the Tanker Plan.
- The Escort System meets state requirements, including BAT (including the towlines specifically). Relevant information from the VERP must be included in the state plan.

- ADEC found the prevention and response training programs adequate, but requested additional information about these during the plan review.

Supporting Documents:

ADEC (2002) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plans, Draft Findings Document, October 17, 2002.
651.300.021017.ADECfindings.pdf

Hutmacher, B. (2002, October 17) Bill Hutmacher, ADEC, to Jeff Williams, ChevronTexaco Shipping Company LLC, RE: Approval Letter, October 17, 2002.
651.410.021017.ADECchevTex.pdf

Prince William Sound Tanker Plan Holders. (2002) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan, Volumes 1 and Volume 2, Third Edition, Rev. 0.

PWSRCAC Comments:

Date	Communication	Contents	Doc Management
August 2001	Comments to ADEC	Comments for RFAI Responses; 2002 PWS ODPCP (26 pp)	600.431.010819.CMTSPhldRFAIIrsp.pdf
May 2002	RFAI to ADEC	RFAI; 2002 PSW ODPCP and Individual Plans (37 pp)	651.431.020510.RFAICplan.pdf
May 2002	Letter to ADEC	RFAI #1; 2002 PWS ODPCP (1 pp)	651.105.020510.TankerRFAI.pdf
September 2001	Letter to ADEC	RFAI #2; 2002 PWS ODPCP (15 pp)	651.105.020926.FinlODPCPCmt.pdf
October 2002	Letter to ADEC	Review of Finding #4 and Finding #7 of 1995 Plan (2 pp)	651.105.021007.ADECooreasTnkPln.pdf
November 2002	Comments by ADEC	ADEC Findings Document Analysis (2 pp)	651.300.021022.TkrCPanlFndgsDEC.pdf

2004 RMROL Regulatory Changes

Summary:
In 1997, the regulations provided for situations in which a plan holder could not successfully operate mechanical response equipment due to environmental limitations (weather, sea states, etc.). Those conditions were called Realistic Maximum Response Operating Limits (RMROL).

The 1997 version of the regulations at 18 AAC 75.445(f) for RMROL read:

> (f) Realistic maximum response limitations. In designing a spill response, severe weather and environmental limitations that might be reasonably expected to occur during a discharge event must be identified. The plan must use realistic efficiency rates for the specified response methods to account for the reduction of control or removal rates under those severe weather or other environmental limitations that might reasonably be expected to occur. The department will, in its discretion, require the plan holder to take specific temporary prevention measures until environmental conditions improve to reduce the risk or magnitude of an oil discharge during period when planned spill response methods are rendered ineffective by environmental limitations.

The 1997 regulations were consistent with statutory requirements in that the plan holder had to either demonstrate the ability to provide mechanical response capability year-round or rely on a combination of mechanical response capability and enhanced prevention capability during conditions exceeding RMROL. The 1997 regulations could be interpreted as providing plan holders an incentive to improve mechanical response equipment required to meet the RPS. Expanding the window of operation for mechanical response equipment narrowed the time when additional temporary prevention measures were required.

Between 1997 and 2004, ADEC received repeated challenges on its PWS tanker plan approval decisions. A number of challengers questioned why ADEC was not using its discretion to require "…the plan holder to take specific temporary prevention measures until environmental conditions improve to reduce the risk or magnitude of an oil discharge during period when planned spill response methods are rendered ineffective by environmental limitations."

Regulations at 18 AAC 75. 445(f) were amended in 2004 to allow the use of non-mechanical response tools when environmental conditions preclude the use of mechanical response:

> (f) Realistic Maximum Response Operating Limitations. In designing a spill response, severe weather and environmental limitations that might be reasonably expected to occur during a discharge event must be identified. The plan must use realistic efficiency rates for the specified response methods to account for the reduction of control or removal rates under those severe weather or other environmental limitations that might reasonably be expected to occur. The department may require the plan holder to take specific temporary prevention or response measures until environmental conditions improve to reduce the risk or magnitude of an oil discharge during periods when

> planned mechanical spill response options are rendered ineffective by environmental limitations. Plans that propose the use of non-mechanical response options under 18 AAC 75.425(e) (3)(D) must meet the requirements of 18 AAC 75.425(e) (1)(G), 18 AAC 75.425(e) (3)(G), and (h) of this section.

18 AAC 75.445(h) was also amended. This change is relevant because it allows the use of non-mechanical response techniques when mechanical response techniques are rendered ineffective:

> (h) Nonmechanical Response Information. Plans which propose the use of dispersants, in situ burning, or other nonmechanical response techniques during periods when environmental conditions or other factors limit the use of mechanical spill response methods must demonstrate their efficiency and effectiveness and must include a full assessment of potential environmental consequences, provisions for continuous monitoring and real-time assessment of environmental effects, and full compliance with all applicable approval requirements. If in situ burning is proposed as a response technique, a completed application for approval by the department must be included.

2004 Minor Amendments

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
In late 2003 and early 2004, the RPG submitted a series of six minor amendments to the plan, each concerning a separate issue. Since all amendments were submitted at roughly the same time, they are grouped together in this summary.

The amendment numbers, approval dates, and changes incorporated are listed below.

- #2003-01; January 2, 2004; description of APSC equipment maintenance system, and announced and unannounced exercise schedule and records maintenance
- #2003-02; December 23, 2003; vessel change from Protector Class to a conventional tug
- #2003-03; approval date unknown; implemented personnel job description and training updates
- #2003-04; January 30, 2004; response equipment description revisions
- #2003-05; April 5, 2004; wildlife response clarifications following the wildlife workgroup
- #2003-06; April 19, 2004; editorial corrections

Supporting Documents:

RPG. (2002) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan.
Colby, T. (2003, December 8) Tom Colby, Plan Administrator, to John Kotula, ADEC, re: Application for Amendment #2003-01 to the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan, December 8, 2003.
651.300.031208.ATCtkrAmend1.pdf

Colby, T. (2003, December 8) Tom Colby, Plan Administrator, to John Kotula, ADEC, re: Application for Amendment #2003-02 to the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan, December 8, 2003.
651.300.031208.ATCtkrAmend2.pdf

Colby, T. (2003, December 8) Tom Colby, Plan Administrator, to John Kotula, ADEC, re: Application for Amendment #2003-03 to the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan, December 8, 2003.
651.300.031208.ATCtkrAmend3.pdf

Schorr, B. (2003, December 23) Betty Schorr, ADEC, to Tom Colby, Plan Administrator, on behalf of the Response Planning Group, RE: Routine Plan Amendment (#2003-02) to the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan Parts 1, 2, 3, and 4, as

amended,
December 23, 2003.
651.300.031223.ADECtkrPln.pdf

Schorr, B. (2004, January 2) Betty Schorr, ADEC, to Tom Colby, Plan Administrator, on behalf of the Response Planning Group, RE: Routine Plan Amendment (#2003-01) to the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan Parts 1, 2, 3, and 4, as amended, January 2, 2004.
651.300.040102.ADECtkrAmnd.pdf.pdf

Schorr, B. (2004, January 30) Betty Schorr, ADEC, to Tom Colby, Plan Administrator, on behalf of the Response Planning Group, RE: Routine Plan Amendment (#2003-04) to the Prince William Sound Tanker Oi4 Discharge Prevention and Contingency Plan Parts 1, 2, 3, and 4 (Core Plan), as amended, January 30, 2004.
651.300.040130.ADECtkrCore.pdf

Schorr, B. (2004, April 5) Betty Schorr, ADEC, to Tom Colby, Plan Administrator, on behalf of the Response Planning Group, RE: Routine Plan Amendment (#2003-05) to the Prince William Sound Tanker Oi4 Discharge Prevention and Contingency Plan Parts 1, 2, 3, and 4 (Core Plan), as amended, April 5, 2004.
651.300.040405.ADECcore1234.pdf

Schorr, B. (2004, April 19) Betty Schorr, ADEC, to Tom Colby, Plan Administrator, on behalf of the Response Planning Group, RE: Routine Plan Amendment (#2003-06) to the Prince William Sound Tanker Oi4 Discharge Prevention and Contingency Plan Parts 1, 2, 3, and 4 (Core Plan), as amended, April 19, 2004.
651.300.040419.ADECtkrC1234.pdf

PWSRCAC Comments:

Date	Communication	Contents	Doc Management
April 2004	Letter to PWSRCAC	Amendments to PWS ODPCP (3 pp)	651.300.040420.AmdsTkrCPApr04.pdf
June 2004	Letter to ADEC	Comments on PWS ODPCP Krystal Sea Amendment (2 pp)	651.105.040609.ADECDrystal.pdf

2004 Major Amendment

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
On December 8, 2003, the RPG submitted an application for amendment #2004-01 which replaced the landing craft Krystal Sea with an integrated tug and barge also known as Krystal Sea, and changed the home port of the vessel from Valdez to Cordova.

This amendment was a significant enough change to the response equipment in PWS to warrant being considered a major amendment, and so underwent a public review process. With this amendment, the plan holders replaced the landing craft Krystal Sea with an integrated tug and barge also known as Krystal Sea, and changed the home port from Valdez to Cordova.

In its approval letter, ADEC required three COAs: that the plan holders

1. demonstrate the new Krystal Sea's response capabilities and that the vessel was adequately staffed with trained crew members;
2. confirm the vessel's availability and procedures for addressing circumstances when the vessel would not be available; and
3. agree to the requirement that the Krystal Sea remain in the region of operation in order to meet RPS requirements.

The amendment was approved on June 22, 2004. The RPG addressed their compliance with the COAs in a letter dated June 3, 2005.

Supporting Documents:

Colby, T. (2005, June 3) Tom Colby, Plan Administrator, to John Kotula, ADEC, re: Plan Amendment (#2004-01) to the Prince William sound Tanker Oil Discharge Prevention and Contingency Plan, June 3, 2005.

Schorr, B. (2004, June 22) Betty Schorr, ADEC, to Tom Colby, Plan Administrator, on behalf of the Response Planning Group, RE: Routine Plan Amendment (#2004-01) to the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan Parts 1, 2, 3, and 4, as amended, June 22, 2004.

651.300.040622.ADECamendApp.pdf

2005 Minor Amendments

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
On October 6, 2005, the plan holders submitted applications for six minor amendments to the plan, each concerning a separate issue. Since all amendments were submitted at the same time, they are grouped together in this summary.

The amendment numbers and changes incorporated are listed below.

- 2005-1; boom storage locations and replacement of Hi Sprint and Hi Integrity boom with Ro-2000 boom on the barge 500-2
- 2005-2; storage location of Sea Mop and Termite skimmer systems
- 2005-3; edits to Part 3 Sid 1 Section 7, Dispersants
- 2005-4; replacement of GrahamRec skimmers with TransRec skimmers
- 2005-5; edits to the Communications section

All amendments were approved in the same letter dated October 14, 2005.

Supporting Documents:

Colby, T. (2005, October 6) Tom Colby, Plan Administrator, to John Kotula, ADEC, re: Routine Plan Amendment 2005-01 Replacement of Hi Sprint and Hi Integrity Boom, October 6, 2005.
651.300.051006.RPGamend2005-01.pdf

Colby, T. (2005, October 6) Tom Colby, Plan Administrator, to John Kotula, ADEC, re: Routine Plan Amendment 2005-02 Sea Mop and Termite Skimmer Systems, October 6, 2005.
651.300.051006.RPGamend2005-02.pdf

Colby, T. (2005, October 6) Tom Colby, Plan Administrator, to John Kotula, ADEC, re: Routine Plan Amendment 2005-03 Changes in Part 3 Sid 1, Section 7, Dispersants, October 6, 2005.
651.300.051006.RPGamend2005-03.pdf

Colby, T. (2005, October 6) Tom Colby, Plan Administrator, to John Kotula, ADEC, re: Routine Plan Amendment 2005-04 Replacement of GrahamRec Skimmers with TransRec Skimmers, October 6, 2005.
651.300.051006.RPGamend2005-04.pdf

Colby, T. (2005, October 6) Tom Colby, Plan Administrator, to John Kotula, ADEC, re: Routine Plan Amendment 2005-05 Changes to the Communications Section, October 6, 2005. (Letter was misdated 2004)
651.300.051006.RPGamend2005-05.pdf

RPG. (2002) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan.

Schorr, B. (2005, October 14) Betty Schorr, ADEC, to Tom Colby, Plan Administrator, on behalf of the Response Planning Group, RE: Routine Plan Update Amendments to the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan (Core Plan) Third Edition, Rev 2, October 14, 2005.
651.300.051014.RPGCorPlnRvw.pdf

2006 Amendments

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
In 2006, the plan holders submitted applications for three amendments to the plan, each concerning a separate issue. Amendments #2006-01 and -03 were minor amendments. Amendment #2006-02 was a major amendment. Each of the three is discussed below.

Amendment #2006-01
On May 11, 2006, the plan holders submitted amendment #2006-01 which described their intent to replace the lightering barge 570 with barge 450-7, a newer and larger barge. All lightering equipment was to be transferred to the 450-7. As there was no diminishment of the plan holders' ability to respond to an oil spill, the amendment was approved without public review by ADEC on May 15, 2006.

Amendment #2006-02
On June 5, 2006, the plan holders submitted plan application for amendment #2006-02 which proposed changes to the equipment and tactics used by Nearshore Task Forces 1 – 4. These changes include the incorporation of the Current Buster booming systems in place of a portion of the U/J boom configurations previously used. If adopted, there were resultant changes in the number of fishing vessels required by a Near Shore Task Force. Because there was a possibility of diminishment of response capability, ADEC required this amendment application to undergo a public review. On July 31, 2006, ADEC submitted seven requests for additional information to the plan holder. The information was adequately supplied, and ADEC approved the amendment on October 18, 2006.

The approval included three COAs:

1. Assignment of one additional fishing vessel to any Near Shore Task Force which incorporated a Current Buster system,
2. Fishing vessel crew training in all near shore tactics, and
3. A requirement that eight Current Buster systems would be available for deployment before the amendment could become effective.

Amendment #2006-03
On April 28, 2006, the plan holders submitted an application for plan amendment #2006-03 to clarify the phrase "equipment caretaker" found in various sections throughout the plan. The parenthetical "(SERVS personnel or contractors) was added following the phrase. As there was no diminishment of the plan holders' ability to respond to an oil spill, the amendment was approved without public review by ADEC on May 8, 2006.

Supporting Documents:

Coffey, T. (2006, April 28) Tracy Coffey, Plan Administrator, to John Kotula, ADEC, re: Routine Plan Amendment 2006-03 Adjustment to "equipment caretaker" references, April 28, 2006.
651.300.060428.RPGamend.pdf

Coffey, T. (2006, May 11) Tracy Coffey, Plan Administrator, to John Kotula, ADEC, re: Routine Plan Amendment 2006-01 Replacement of Lightering Barge 570 with Barge 450-7, May 11, 2006.
651.300.060511.SeaRiverPlan.pdf

Kotula, J. (2006, July 31) John Kotula, ADEC, to Tracy Coffey, Plan Administrator, on behalf of the Response Planning Group, RE: Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan Amendment Application 2006-02, Near Shore section, dated June 5, 2006 Request for Additional Information, July 31, 2006.
651.300.060731.ADECnearRFAI.pdf

RPG. (2002) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan.
Schorr, B. (2006, May 8) Betty Schorr, ADEC, to Tracy Coffey, Plan Administrator, on behalf of the Response Planning Group, RE: Routine Plan Amendments (#2006-03) to the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan (Core Plan), May 8, 2006.
651.300.060508.ADECcoreAmen.pdf

Schorr, B. (2006, May 15) Betty Schorr, ADEC, to Tracy Coffey, Plan Administrator, on behalf of the Response Planning Group, RE: Routine Plan Amendments (#2006-01) to the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan (Core Plan), May 15, 2006.
651.300.060515.DECcoreAmend.pdf

Schorr, B. (2006, October 18) Betty Schorr, ADEC, to Tracy Coffey, Plan Administrator, on behalf of the Response Planning Group, RE: Plan Amendment #2006-02 to the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan (Core Plan), October 18, 2006.
651.300.061018.ADECplnAprvl.pdf

2007 Renewal

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
Over a year prior to the expiration of their plans, the RPG members began the process of preparing a renewal application. Of primary importance during this process was a complete restructuring of the plan contents which resulted in moving from the previous three volumes to two volumes: the "core plan" and the SERVS Technical Manual (tech manual). Much of this effort was completed with the active participation of representatives from PWSRCAC, ADEC, APSC/SERVS, the shipping companies, and USCG during a multiday workshop.

The core plan consisted of five parts which align with those required in current Alaska regulations. Included in this volume were the response plans and scenarios, prevention plan, supplemental information, BAT review, and the RPS calculations. This volume is principally kept up to date by the RPG.

The tech manual is generally considered to be under the control of SERVS, but ADEC stipulated during this renewal that it must be included as part of the shippers' plans in order for the plans to be considered complete and approvable under Alaska regulations. The tech manual includes information about available response resources (tugs, barges, skimmers, boom, etc.) and tactics for how the equipment can be used. The information in the tech manual is required to support the response scenarios.

The approval letter for this renewal included eight COA, five of which were standard administrative requirements. One required that the equipment for Nearshore Task Force 5 be maintained until new equipment was obtained and the plan was amended to reflect the new equipment. Two COA required that portions of the plan contents be verified. The first of these required that a workgroup be convened to verify personnel numbers, roles, and deployment strategies. The second required that a field exercise be conducted to verify aerial support needed during dispersant application. The workgroup and the exercise will be discussed separately in this report.

In order to efficiently manage workgroup activities, in early 2008 a Steering Committee was established, comprised of representatives from the RPG, APSC/SERVS, ADEC, and PWSRCAC. The Steering Committee was tasked with determining the issues around which workgroups would be formed and providing guidance to those workgroups. The personnel workgroup mentioned above was the first convened by the Steering Committee.

Supporting Documents:

RPG. (2007) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan. 651.300.080215.RPGpwsCommnt.pdf

APSC/SERVS. (2007) SERVS Technical Manual.
2007 SERVS TM SV-140 E1R0 11.07.pdf

Schorr, B. (2007, October 31) Betty Schorr, ADEC, to Jack Thibault, ATC, re: Plan Approval Letter October 31, 2007. (Note: with regards to the joint ODPCP and SERVS Technical Manual, the approval letters to all plan holders were identical.)
071101 ADEC Approval Letteer ATC copy.pdf

ADEC/SPAR/IPP/MVS. (2007) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan Findings Document.
2007 PWS ODPCP R0 11.07 locked.pdf

PWSRCAC Comments:

Date	Communication	Contents	Doc Management
April 2007	Letter to BP Exploration Alaska	Comments on 2007 PWS ODPCP (32 pp)	651.105.070424.TkrPlanCmts.pdf
May 2007	Letter to BP Exploration Alaska	Redline Draft Version of SERVS Technical Manual (17 pp)	651.105.070510.RPGcmtsTM.pdf
July 2007	Letter to ADEC Industry Preparedness and Pipeline Program	RFAI; 2007 PWS ODPCP and associated Vessel Response Plans (2 pp)	651..105.070723.RFAICoverLtr.pdf
July 2007	Comments and RFAI to ADEC	Comments and RFAI; 2007 PWS ODPCP, VRPs, and SOPEP (17 pp)	651.431.070723.RFAIConPhil.pdf
July 2007	Comments and RFAI to ADEC	Comments and RFAI; 2007 PWS ODPCP and Alaska Tanker Integrated VRP (17 pp)	651.431.070723.RFAIATC.pdf
October 2007	Letter to Marine Vessels Section	Comments on 2007 Renewal (2 pp)	651.105.071015.FinalTkrCmts.pdf

2008 Personnel Workgroup

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
The Alaska Department of Environmental Conservation's (Department) November 2007 approval of the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan (ODPCP) included several conditions of approval, one of which was for the Response Planning Group (RPG) to convene a workgroup which was tasked with using the completely restructured and approved ODPCP to calculate the number of people required to carry out the field work necessary for implementing the first 72 hours of the 809 Scenario. All resources, equipment, and personnel, to implement the first 72 hours of a response are required to be in-region and readily available.

The RPG convened the workgroup in January 2008 with members from SeaRiver Maritime, Inc., Polar Tankers, Inc., the Department, Alyeska Pipeline Service Company's (APSC) Ship Escort/Response Vessel System (SERVS) and the Prince William Sound Regional Citizens' Advisory Council (PWSRCAC). Over the next eight months the workgroup examined the 809 Scenario, SERVS Technical Manual, and SERVS subject matter experts to identify all of the activities in the 809 Scenario response which required field personnel. As much as possible, the activities were grouped into the task forces identified in the Resource Mobilization Chart in the 809 Scenario. Once the activities were identified, the workgroup determined what job roles the activities required, calculated how many people in each job role were required to carry out any given activity, and at what time the personnel would need to be on scene to carry out the response. The final job roles, personnel numbers, and notes on deployment and logistics were displayed in graphs, generally one graph per task force. Those graphs are located in Attachment 2 of this report.

The following table summarizes the minimum number of people needed in each major operational area for each of the first three days of the response. Open water includes lightering, the Valdez Star, and the five TransRec barges task forces; near shore includes up to five task forces and their support barges, wildlife task forces, hatchery protection task forces, small vessel decontamination, response center/staging areas, and other equipment logistics; and miscellaneous includes non-mechanical task forces, tracking and surveillance, waste management and shoreline cleanup assessment teams.

Summary of Personnel Required for First 72 Response Hours

Operational Area	**At Hour 25**	**At Hour 48**	**At Hour 72**
Open Water	96	119	119
Near Shore	35	82	99
Miscellaneous	8	10	10
Total	139	211	228

It is important to note that the numbers in the above table and in the Attachment 2 graphs represent the personnel numbers and position descriptions which were appropriate to man the 809 Scenario response at the time the workgroup completed its task. The numbers required in an alternate response with disparate conditions may be very different. In other words, the workgroup's results represent a "snapshot in time," and may not be accurate in the future if there are changes to the response system or in the APSC training program. Ongoing verification of the plan holders' ability to respond to the spill described in the 809 Scenario would be possible by changing the Attachment 2 graphs to reflect any changes to the response system in place.

Supporting Documents:

Blanchard, T., Miller, S., Morgan, M., Parkin, T., Robertson, R., Schantz, D., Swiss, L. (August 19, 2008) Personnel Workgroup Report: The Field Personnel Requirements for a Hypothetical Tanker Oil Spill Response in Prince William Sound.
PersonnelWorkGroupReportFINAL_000.pdf

2008 Dispersant Work Group

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
ADEC's November 2007 approval of the plan included several conditions of approval, one of which was for the RPG to convene a workgroup that was tasked with conducting a field exercise to verify the aerial support required for dispersant monitoring. One purpose of this exercise was to resolve differences of opinion on the ability of spotter aircraft to also be the monitoring aircraft.
The workgroup convened under a charter adopted on October 7, 2008, and which limited the workgroup's scope to the SERVS tactic that used a C-130 with ADDS pack to apply dispersants (Non-Mechanical Tactic PWS-NM-1/2 Dispersant Treatment/Dispersed Oil Monitoring). An exercise was designed and scheduled for June 1, 2009, using a LAC L-382 aircraft for dispersant application (simulated with water) and a King Air for monitoring and observation.

There was no final report available for the exercise or the workgroup, however, in 2009 the plan holders submitted an application for amendment to the plan that included a change to Tactic PWS-NM-1 to show the use of a spotter aircraft during dispersant application. It was noted that the same plane could subsequently be used to carry out SMART Tier 1 monitoring activities. ADEC determined that this amendment did not meet the criteria of a "major" amendment, and so it was approved without public review.

Supporting Documents:

APSC/SERVS, Dispersant Work Group. (2009) SERVS/LAC Exercise ADDS Pack Deployment June 1st, 2009.
752.410.090727.APSCqtrLstExerc

Thompson, Ed, Mike Meadors, John Kotula, Donna Schantz. (2008) PWS Tanker C-Plan Dispersant Work Group Project Charter.
955.400.081007.DWGcharter

Thompson, Ed. (2009, December 11). Ed Thompson, RPG Chair, to John Kotula, ADEC, re: Application for Amendment to the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan, December 11, 2009.
651.300.091211.BPPWSAmdApp.pdf

2008 Minor Amendment

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
On January 24, 2008, the RPG submitted, on behalf of the six shipping companies, an application for amendment to their plans. The amendment consisted of changes to the core plan and technical manual. This was the first amendment after the newly drafted core plan and technical manual were approved in 2007. The application letter described the amendment as "administrative in nature to correct typographical errors and reformat information to improve clarity."

Changes included:

- Minor wording changes such as changing tugs to escort tugs and APSC and SERVS to APSC/SERVS;
- Text changes to clarify subjects or align descriptions with actual operations;
- Adding oil solidifiers to the Source Control BAT evaluation; and
- Adding black lights to the Prompt Detection of Oil Discharge BAT evaluation.

The ADEC did not deem this amendment as requiring review under 18 AAC 75.455, and so it was approved as a minor amendment without public review on January 29, 2008.

Supporting Documents:

APSC/SERVS. (2007) SERVS Technical Manual.
2007 SERVS TM SV-140 E1R0 11.07.pdf

RPG. (2007) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan.
Schorr, B. (2008, January 29) Betty Schorr, ADEC, to Ed Thompson, Plan Administrator, on behalf of the Response Planning Group, RE: Routine Plan Amendment (#2007-01) to the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan (Core Plan) Approved October 31, 2007, January 29, 2008.
651.300.080129.ADECcoreAmd.pdf

Thompson, Ed (on behalf of the RPG). (2008, January 24) Ed Thompson, Plan Administrator, to John Kotula, ADEC, RE: Application for Amendment to the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan, January 24, 2008.
651.300.080124.RPGpwsApAmd.pdf

2009 Wildlife Exercise

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
On May 18, 2009, a Wildlife Task Force field deployment was completed by APSC/SERVS with Polar Tankers as the plan holder of record. With a focus on the wildlife strategies and tactics contained in the 2008 SERVS Technical Manual, this exercise was the first time a full wildlife task force was deployed and tested.

A seven-boat task force was deployed in response to a simulated oil slick in Port Valdez with the following objectives:

1. Choose best location for deployment of wildlife hazing equipment;
2. Properly and safely set up and use passive wildlife hazing equipment (e.g., Mylar tape);
3. Simulate proper and safe use of non-passive wildlife hazing equipment (e.g., Breco A/V alarm, propane cannon, shotgun/cracker shells, etc);
4. Capture and handle simulated otters and birds;
5. Contain and transport simulated otters and birds; and
6. Document all wildlife task force activities using proper forms.

A variety of lessons learned were captured from the exercise in the areas of planning, documentation, communications, and equipment. Overall, the exercise was considered a success because it so completely tested the functioning of an entire task force in the field.

Supporting Documents:

ConocoPhillips/Polar Tankers, Inc. and Alyeska Pipeline Service Company/SERVS. 2009. Prince William Sound 2009 Response Exercise Wildlife Task Force Deployment, May 18, 2009, Final Report.
752.300.090805.ADECPWSCPWldfRpt.pdf

Robertson, Roy. (2009) Polar Tankers Prince William Sound 2009 Response Exercise Wildlife Task Force Deployment Exercise Report.
752.431.090518.wildlifePolarTanker090518.pdf

2009 ANS Crude Workgroup

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
During the 2009 testing of the Crucial fuzzy disc skimmers, it was noted by PWSRCAC and others that the properties and characteristics of Alaska North Slope crude oil should be evaluated to determine if they had changed since last examined in 1989, in ways that would impact oil spill response and recovery. As a result, the Steering Committee convened a work group in October 2009 consisting of representatives from PWSRCAC, ADEC, USCG, APSC/SERVS, and RPG.

According to the work group charter, the expectations for the group were:

1. The Work Group is expected to determine the current ANS Crude properties that impact oil spill response.
    a. The work group will look at oil properties as they apply to oil spill response over 2 blocks of time: the first 72 hours of the response (days 1-3); and again, for days 4-6.
2. This work group will likely involve data gathering and consultation with Subject Matter Experts within and outside the work group.
3. Inform the Steering Committee of any issues / recommendations for modification of the Charter at any time during the Work Group's tenure.
4. The RPG will facilitate obtaining ANS Crude samples, for the purposes of the WG needs, as requested by the Work Group.

SL Ross Environmental Research, Ltd. and Merv Fingas, Spill Science, Environment Canada were retained to conduct laboratory analyses on ANS crude samples. Their analyses concluded that the oil property assumptions in the tanker ODPCP were correct. The workgroup reported that result with the recommendations that the properties should be retested and an update on the properties made at the time of each plan renewal.

Supporting Documents:

Fingas, Merv. (2010) Review of the North Slope Oil Properties Relevant to Environmental Assessment and Prediction.
500.431.100601.ANSpropRevw.pdf

SL Ross Environmental Research, Ltd. (2010) Spill Related Properties of ANS 2010 Crude Oil.
500.431.100301.SLRans2010Rpt.pdf

2009 Crucial Skimmer Work Group

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
The RPG, in partnership with Crucial, Inc., developed high capacity oleophilic skimmers with which the RPG wanted to replace the TransRec and GrahamRec skimmers in the open water portion of the PWS response system. State of Alaska regulation at 18 AAC 75.445(g)(5) required that skimmers be allowed "…an effective oil recovery capacity of 20 percent of the equipment manufacturer's rated throughput capacity over a 24-hour period, unless an analysis demonstrates to the satisfaction of the department that another effective daily oil recovery capacity is appropriate…." In order to receive more than 20 percent "credit" for the new Crucial skimmers, the Steering Committee convened a workgroup to oversee skimmer testing at the Ohmsett facility in New Jersey to determine total throughput, oil recovery rate, and oil recovery efficiency in accordance with ASTM F2709. SL Ross was contracted to design and conduct the testing in March 2009 which was attended by representatives from the RPG, ADEC, PWSRCAC, USCG, and others.

On December 8, 2014, ADEC approved the following oil recovery rates and efficiencies for the PWS tanker plan:

- Crucial Model C-Disc 13/30:79 bbl/hr ORR; 70%ORE
- Crucial Model C-Disc 56/30:354 bbl/hr ORR; 70%ORE
- Crucial Model C-Disc 88/30:550 bbl/hr ORR; 70%ORE
- Crucial Model C-Disc 100/30:629 bbl/hr ORR; 70%ORE

The results of this workgroup and the approved skimmer oil recovery rates and efficiencies were used to make changes to the tanker ODPCP which were put into effect with the approval of the 2017 renewal.

Supporting Documents:

Haugstad, Eric. (2009) PWS Tanker C-Plan Crucial Skimmer Performance Workgroup Charter.
600.450.100101.CruclSkmmrChrt.pdf

Schorr, Betty. (2009, September 11) Betty Schorr, ADEC, to Plan Holder/PRAC re: Oil Discharge Prevention and Contingency Plan Skimmer and Pump Recovery Rates, September 11, 2009.
651.300.090911.ADECdrateLTR.pdf

SL Ross Environmental Research Limited. (2009) Determining the Nameplate Capacity of a Modified Crucial Disc Skimmer Phase 4.
752.410.090302.OhmsettSkim.pdf

SL Ross Environmental Research Limited. (2009) Alaska Shippers Skimming Tests, Phase 5: Testing at Ohmsett to Determine Nameplate Capacity with Modified Crucial Disc Skimmer.
752.410.100415.OHMSETSkimTests.pdf

Wood, Graham. (2014, December 8). Graham Wood, ADEC, to Montgomery Morgan, RPG Chairman, re: Prince William Sound Crucial Model C-Disk Simmer Efficiency Decision, December 8, 2014.
651.300.150904.ADECcrclSkmmr.pdf

2010 Fishing Vessel Numbers Work Group

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
Because the number and definition of fishing vessels needed to meet all RPS requirements during the first 72 hours of a response had proven to be a source of confusion and misunderstanding, a workgroup was convened to review the SERVS tactics and the 809 Scenario and count the number of fishing vessels required at hours 24, 48, and 72+ of the response scenario. The workgroup did not assess operational requirements for the fishing vessels based on tasking (e.g., whether a seiner, bowpicker, or tender would be best suited to a task), but only looked at total numbers required.

In order to accomplish this task, the work group walked through the scenario step by step, noting when fishing vessels were required to be on scene and operational for any given task or for assignment to a task force. They then worked backward to determine when those vessels would have to be dispatched in order to arrive on scene in time. Requirements for maximum operational times and downtime for maintenance and resupply were also taken into account.

The workgroup recommended adding a column to the tables in the 809 Scenario to show numbers of fishing vessels required at various times, but did not suggest any changes to the total number of fishing vessels needed. The workgroup did note in its final memo, however, that issues identified during the October 10, 2010, nearshore exercise might lead to the need for additional clarification of vessel types and duties.

Supporting Documents:

Morgan, Monty. (2011, February 16) Monty Morgan, Polar Tankers, to the Workgroup Steering Committee, re: Memo regarding the Work Group for Fishing Vessel Numbers, February 16, 2011.

FVNumbersWGFinalSummary.pdf

Thompson, Knolle, Kotula, and Schantz. (2010) PWS Tanker C-Plan Fishing Vessel Numbers in the First 72 Hours Charter.

FVNumbersCharterDRAFT2ChangesAccepted.pdf

2010 Nearshore Exercise

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
On August 16, 2010, ADEC sent the RPG notice that ADEC intended to conduct an unannounced exercise within six months to test the plan holders' ability to implement a nearshore response on a real-time basis in order to address on-going concerns about nearshore response capabilities. The exercise was initiated on October 10, 2010, with the following objectives:

- Assign all personnel and fishing vessels required to carry out the 809 Scenario for 72 hours;
- Manage operations on the Barge 500-2 to provide all necessary support for three nearshore task forces;
- Demonstrate the ability to manage and operate three nearshore task forces within a five-mile radius of the Barge 500-2 for free oil recovery and sensitive area protection;
- Validate fishing vessel captains' ability to fully perform all Task Force and Strike Team Leader duties; and
- Demonstrate the effective use of proper lines of communication.

Polar Tankers, Inc. acted as the plan holder of record for the exercise which lasted two days with 24-hour operations, and involved over 90 fishing vessels and SERVS-operated boats in addition to the Barge 500-2 and associated tug. The exercise was evaluated by representatives from ADEC, RPG, PWSRCAC, USCG, and SERVS, and debriefs were held with fishing vessel captains in Cordova, Whittier, and Valdez.

Lessons learned were group into the categories timing, resources, equipment, and training. A number of areas were identified for which ADEC determined the plan holders and APSC/SEERVS could not meet their plan commitments. On October 29, 2010, ADEC met with the RPG to discuss interim compliance measures which were summarized in a letter sent to the RPG that same day. The interim measures required ensuring that there were enough personnel on the Barge 500-2 to carry out all of the functions of the barge and that an operational plan was put in place to manage barge functions to ensure plan requirements were met. The RPG responded with a letter on November 12, 2010, that described changes to Barge 500-2 manning and operations, as well as considerations regarding contractor work hours, tasks able to be completed while the Barge 500-2 is underway, and minibarge offloading processes.

ADEC's final report on the exercise was sent to Polar Tankers on December 7, 2010, with the warning that another unannounced nearshore exercise would be called before May 2011 to further test response capabilities. This follow-up exercise was conducted on April 18, 2011, and is discussed elsewhere in this report.

Supporting Documents:

Colby, Tom. (2010, November 12) Tom Colby, acting Response Planning Group Chairman, to John Kotula, ADEC, November 12, 2010. [Notification of implemented interim compliance measures].
752.300.101112.RPGnsExRspnse.pdf

Kotula, John. (2010, August 16) John Kotula, ADEC, to Tom Colby, acting Response Planning Group Chairman, August 16, 2010. [Notice of forthcoming unannounced exercise].
657.300.100816.ADECpwsNrshEx.pdf

Kotula, John. (2010, October 29) John Kotula, ADEC, to Tom Colby, acting Response Planning Group Chairman, October 29, 2010. [Requirement of interim compliance measures].
752.300.101029.ADECpwsNrShreEx.PDF

Kotula, John. (2010, December 7) John Kotula, ADEC, to Monty Morgan, Polar Tankers, Inc., December 7, 2010. [Final nearshore exercise report and cover letter].
752.410.101207.UnanncNshExcRpt.pdf

Robertson, Roy. (2010) Port Fidalgo Unannounced Nearshore Drill, October 10, 2010, Equipment Deployment Report.
752.431.101010.PFunanncdNrshr.pdf

2011 Nearshore Exercise

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
Following the October 10, 2010, Nearshore Exercise, ADEC required the plan holders and SERVS put measures into effect to ensure their plan commitments would be met and warned that another unannounced nearshore exercise would be called before May 2011 to further test response capabilities. This follow-up exercise was conducted on April 18, 2011, with Polar Tankers, Inc. again volunteering to act as the plan holder of record.

This follow-up exercise lasted three days, and again involved over 90 fishing vessels and SERVS-operated boats in addition to the Barge 500-2 and associated tug. The exercise was evaluated by representatives from ADEC, RPG, PWSRCAC, USCG, and SERVS, and debriefs were held with fishing vessel captains in Cordova, Whittier, and Valdez.

As with the 2010 exercise, lessons learned were grouped into the categories timing, resources, equipment, and training. While improvements were seen over the previous exercise, there were still a number of areas for which ADEC determined the plan holders and APSC/SEERVS could not meet their plan commitments.

On July 27, 2011, ADEC issued its final report on the exercise. Although the report acknowledged that improvements had been made in some areas, the accompanying cover letter listed 12 areas in which the "Prince William Sound plan holders, through their contractor Alyeska Pipeline Service Company (APSC)JSERVS cannot meet the commitments described in the plan or for which the plan does not adequately describe operational realities." Most of these issues had been raised after the 2010 exercise, as well. ADEC required that the plan holders arrange a meeting between them, PWSRCAC, and USCG to discuss the report, describe any improvements made to the system since the April exercise, and develop a path forward to ensure a nearshore response could be adequately carried out in the future.

The above meeting took place on September 1, 2011. Subsequently, on September 14, APSC/SERVS sent a letter to Monty Morgan, Polar Tankers, which described the status of and/or action steps for the 12 areas of concern raised by ADEC. In October 2011, a workgroup was convened to address nearshore response issues (discussed elsewhere in this report).

Supporting Documents:

Miller, Sharry. (2011, July 27) Sharry Miller, ADEC, to Monty Morgan, Polar Tankers, Inc., July 27, 2011. [Final nearshore exercise report and cover letter].
752.300.110727.DECnrshrExRpt.pdf

Morales, Andres. (2011, September 14) Andres Morales, APSC, to Monty Morgan, Polar Tankers, Inc., September 4, 2011. [Letter describing status of nearshore response and action steps following the April 18, 2011, nearshore exercise].
752.300.110914.APSCnrshrExRsp.pdf

Robertson, Roy. (2011) Naked Island Unannounced Nearshore Drill, April 18, 2011, Equipment Deployment Report.
752.431.110418.NakedIslNoNtc.pdf

2011 Nearshore Workgroup

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
The October 2010 and April 2011 nearshore exercises identified a need to review and update the nearshore response components of the ODPCP. The Steering Committee convened a workgroup to analyze the nearshore components, particularly Task Forces 1 – 8, keeping in mind current Anvil Study assumptions, and recommend improvements, as needed, to tactics, job aides, and training. This workgroup included representatives from the RPG, PWSRCAC, ADEC, APSC, and USCG.
According to the Nearshore Work Group White Paper, "The Work Group reviewed available historical documents and job aides associated with the Nearshore response; assessed Nearshore response tactics; and considered all aspects of Nearshore group management. Of importance to the PWS response system and this Work Group was the 1995 Anvil Study. The Work Group reviewed various Anvil Study versions, associated correspondence, and other related documents, and determined that the 1995 version best represented the oil recovery planning assumptions which the Core Plan uses to demonstrate the plan holders' ability to meet the response planning standard defined in Alaska regulations (all documents are listed in the bibliography). Included in these assumptions are expectations for equipment types and task force configurations."

The Work Group recommended revisions in many areas, including:

- Task force operational times,
- Task force equipment lists,
- Equipment deployment from the barge 500-2,
- Minibarge towing,
- Operations during darkness,
- Minibarge discharge containment during offloading,
- Debris management,
- Use of support vessels,
- Sensitive area protection,
- Vessel decontamination,
- Skimmer operations, and
- Primary storage.

During the time in which this workgroup was convened, the ODPCP and SERVS Technical Manual were renewed and approved in 2012. That renewal incorporated the majority of the workgroup's recommendations. Additionally, exercises were conducted to provide training and test components of the nearshore response system.

Supporting Documents:

Pace, John and Nearshore Workgroup. (2012) Nearshore Work Group White Paper.
657.107.111029.NrShrWrkGrpRpt.pdf

Yarbrough, R., Morales, A., Schantz, D., Kotula, K. (2011, October 21) Updating Nearshore Response Workgroup Charter and Nearshore Tactics Go Forward Plans for Structural Improvements.
651.590.111001.NrshrRspCharter.pdf and 651.590.111001.NrshrTacticPln.pdf

2012 Renewal

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
Nearly a year prior to the expiration of their plans, the RPG members began the process of preparing a renewal application. Important changes to the plan as submitted for this renewal included the following.

- A change in the cargo capacity of the largest tanker in the PWS system resulted in a change to the RPS volume. In the 2012 plan, the plan holders identified ATC's Alaskan Legend as the largest tanker with a cargo capacity of 1,300,351 bbl. In the 2007 plan, the largest ship was the Sea River Long Beach at 1,515,132 bbl. After including regulatorily allowed RPS reductions, this change resulted in a reduction of the RPS volume from 809,080 bbl to 546,147 bbl. This adjustment did not substantially change the response requirements in the plan as they are driven primarily by the need to contain, control, or clean up 300,000 bbl of oil in the first 72 hours, but it did mean that the main RPS scenario was called the "546 Scenario" rather than the "809 Scenario".

- The creation of dedicated Sensitive Area Task Forces and the integration of the Hatchery Protection Task Forces into the SAP task forces. The end result was that all sensitive areas in PWS, including salmon hatcheries, would be assessed for protection during an oil spill; priority would not necessarily be given to hatcheries if the oil spill trajectory did not indicate that necessity; and

- Modifications to the nearshore response system recommended following on-water exercises and by the Nearshore Workgroup.
    - One significant change was requiring 40 Tier II fishing vessels to be available to leave the harbor at Hour 18 rather than Hour 24, the prior standard for all Tier II vessels.

The approval letter for this renewal included six COA, five of which were standard administrative requirements. The sixth COA required a change to the information in the SERVS Technical Manual to show the requirement for 40 fishing vessels at Hour 18, as noted above.

ADEC identified several areas which needed to be verified through oil discharge exercises following the plan approval and which were documented in the 2012 Findings Document.

- Nearshore response
- Open water response
- Sensitive area protection
- Tier II fishing vessel availability, including the availability of 40 vessels by Hour 18
- Tier III activation process and training
- Tanker- and barge-of-opportunity availability

- Open water and nearshore oil recovery operations during hours of darkness
- Availability of specialty vessels, including tenders, through the fishing vessel program to meet plan requirements, including the tasks for which the Krystal Sea/Cordova Provider was previously contracted

Many activities occurred as a result of the above list. Those discussed further in this report include a 2012 nearshore night operations exercise and a 2014 nearshore exercise.

Supporting Documents:

RPG. (2012) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan.
2012 PWS Tanker ODPCP R0 11.12.pdf

APSC/SERVS. (2012) SERVS Technical Manual.
2012 SERVS TM SV-140 E2R1 6.13.pdf

Schorr, B. (2012, November 1) Betty Schorr to Polar Tankers, Inc., November 1, 2012 [Approval Letter]. (Note: with regards to the joint ODPCP and SERVS Technical Manual, the approval letters to all planholders were identical.)
ADEC approval letter 11.1.12 copy.pdf

ADEC/SPAR/IPP/MVS. (2012) 2012 Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan Findings Document.
ADEC Findings Document 11.1.12 copy.PDF

PWSRCAC Comments:

Date	Communication	Contents	Doc Management
March 2012	Letter to ADEC	Comments and RFAI #1; 2012 PWS ODPCP (2 pp)	651.105.120323.TkrPlnCmtCvr.pdf
March 2012	Comments and RFAI to ADEC	RFAI #1 and Comments; 2012 PWS ODPCP (50 pp)	651.431.120323.RFAITkrCplan.pdf
August 2012	Letter to ADEC	RFAI #2 PWS ODPCP (2 pp)	651.105.120817.TkrPlnCmtCvr.pdf
August 2012	Comments and RFAI to ADEC	RFAI #2 and Comments; 2012 PWS ODPCP (10 pp)	651.431.120817.TkrCplnRFAI2.pdf
October 2012	Comments and RFAI to ADEC	Final Comments; 2012 PWS ODPCP and	651.431.121012.TkrPlncmtFinal.pdf

		SERVS (20 pp)	
October 2012	Letter to Marine Vessels Section Division of Spill Prevention and Response	Final comments; 2012 PWS ODPCP (3 pp)	651.105.121012.TkrPlnCvr.pdf

2012 ANS Crude Workgroup

Plan holders:
ATC, SeaRiver, Tesoro, BP Alaska, Polar Tankers, Chevron

Summary:
Following the 2009 – 2010 ANS Crude Oil Properties workgroup recommendations that oil samples be tested prior to each plan renewal, the Steering Committee convened a workgroup again in 2012 to have samples tested again (an attempt was initially made to convene the workgroup in 2011, but was not finally convened until 2012).

SL Ross was retained to conduct laboratory analyses on ANS crude samples, subsequent to which they produced a report titles "Spill Related Properties of ANS 2012 Crude Oil". Additionally, Merv Fingas, Spill Science, Environment Canada, prepared the report, "Review of the North Slope Oil Properties Relevant to Environmental Assessment and Prediction."

The results of the above reports were summarized in a memo from the workgroup to the Steering Committee. The workgroup determined that the properties of ANS crude had not changed significantly enough to impact skimmer performance, but recommended that retesting be conducted every five years at the midpoint of plan approval (to allow time for any changes required to be made before the plan was next submitted for approval).

Supporting Documents:

DeVries, Mark. (2013) Memo to the Steering Committee on behalf of the ANS Crude Properties Workgroup with final results.
Oil_Properties_WG_09_July_2013_final.pdf

LeJeune, Fred; Morales, Andres; Kotula, John; Schantz, Donna (Steering Committee). (2012) PWS Tanker C-Plan Updating ANS Crude Properties Charter.
651.410.120410.ANSCrdPropChrtr.pdf

SL Ross Environmental Research Ltd. (2012) ANS Crude Oil Sampling Standard Operating Procedure.
651.400.121017.ANSCrdOilStndOpPrcdr.pdf

SL Ross Environmental Research Ltd. (2013) Spill Related Properties of 2012 ANS Crude Oil.
ANS2012OilAnalysis-Report_Final03_2013.pdf

2017 Renewal

Plan holders:
ATC, BP Alaska, Chevron, Polar Tankers, SeaRiver, Tesoro

Summary:
In April 2016, the RPG members began the process of preparing a renewal application which was approved in February 2017. Important changes to the plan as submitted for this renewal included:

- The 100-disc Crucial oleophilic skimmers were adopted into the open water response system. One open-water barge was equipped with Crucial skimmers and the TransRec/GrahamRec skimmers were removed from it.
- One open-water barge was removed from the response system as it was determined the improved ORR and ORE of the Crucial skimmers over the TransRec would result in a reduced need to store recovered water and emulsion. Therefore, only four barges (rather than five) were needed to store anticipated recovered liquids in the 546 Scenario.

The approval letter for this renewal included three COA: administrative corrections to the SERVS Technical Manual, usual requirements for Fishing Vessel program updates, and a standard requirement that ADEC be notified if there is any change to the plan holders' relationship with the response contractors.

Supporting Documents:

ADEC/SPAR/IPP/MVS. (2017) 2017 Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan Findings Document.
20170201 Polar approval letter w ADEC Findings Doc.pdf

APSC/SERVS. (2017) SERVS Technical Manual.
SV-140_Ed_3_Rev_3_CD.pdf

RPG. (2017) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan.
PWS_ODPCP_2017_Ed_Rev_3_CD.pdf

Wood, Graham. (2017, February 1) Graham Wood, ADEC, to Karen Hays, Alaska Tanker Company, re: Plan approval letter, February 1, 2017. (Note: with regards to the joint ODPCP and SERVS Technical Manual, the approval letters to all plan holders were identical.)
20170201 Polar approval letter w ADEC Findings Doc.pdf

PWSRCAC Comments:

Date	Communication	Contents	Doc Management
July 2016	Comments and RFAI to ADEC	Comments and RFAI; 2016 Application for Renewal of PWS ODPCP and SERVS (16 pp)	651.431.160701.PWStkrCmts.pdf
July 2016	Letter to ADEC	Comments and RFAI; 2016 Application for Renewal of PWS ODPCP and SERVS (16 pp) (2 pp)	651.105.160701.PWStkrCmtCvr.pdf
December 2016	Comments and RFAI to ADEC	Round 2: Comments and RFAI; 2016 Application for Renewal of PWS ODPCP and SERVS (16 pp) (8 pp)	651.431.161215.TkrCmtsRFAI.pdf

2018 Major Amendment – Marine SVCS Transition

Plan holders:
ATC, BP Alaska, Chevron, Polar Tankers, SeaRiver, Tesoro

Summary:
On May 31, 2017, the plan holders submitted an application for amendment to the ODPCP and SERVS Technical Manual which focused on the transition of marine services from Crowley to Edison Chouest Offshore (ECO). An accompanying document describing the transition plan was also submitted for reference. The amendment was approved on June 22, 2018.

This amendment not only changed the contractor that provided tanker escort services and the tugs and barges for a spill response, but also introduced an entirely new fleet of tugs and oil spill response barges (OSRB) to the system. Of the previously contracted barges, only the Mineral Creek remained for lightering and nearshore task force support.

The approval letter for this amendment included six COA.

1. Requirement to make seven administrative edits and factual corrections prior to publication.
2. PWS Transition Plan changes and implementation, including:
    a. Updates to training information,
    b. Adding an appendix to the Transition Plan which maintained the TransRec tactics until all TransRec skimmers were decommissioned,
    c. Inclusion of the Transition Plan as an appendix to the ODPCP until transition was complete, and
    d. Additional demonstrations and documentation to assure vessel configuration and crew training.
3. Submittal of additional documentation, including ABS and USCG documentation and load and decant plans for the Mineral Creek and OSRBs.
4. Update of PWS Tanker C-plans information regarding escort and sentinel tugs, as well as the response training program.
5. Additional exercise requirements which included a tabletop exercise for additional personnel needed to meet the 18-hour commitment, a lightering barge exercise, and field demonstrations of open water recovery operations.
6. Requirement to provide quarterly reports for crew training and exercises,

Accompanying the approval letter was a Basis of Decision (Findings Document) which discussed 11 issues of importance or concern during the plan approval process for which ADEC explained their decision rationale.

Supporting Documents:

ADEC/SPAR/IPP/MVS. (2018) Oil Discharge Prevention and Contingency Plan Basis of Decision.

APSC/SERVS. (2018) SERVS Technical Manual.

Fletcher, S. and Miller, S. (2020) Memo RE: Conclusion of 2017-2018 PWS Tanker Plan Review (SERVS Transition).
651.300.200807.NukaSERVStrnstn.pdf

RPG. (2018) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan.

Wood, Graham. (2018, June 22) Graham Wood, ADEC, to Karen Hays, Alaska Tanker Company, re: Amendment approval, June 22, 2018. (Note: with regards to the joint ODPCP and SERVS Technical Manual, the approval letters to all plan holders were identical.)
20180622-ATC-ApprovalECOAmend.pdf

PWSRCAC Comments:

Date	Communication	Contents	Doc Management
May 2018	Letter to ADEC	Rounds 1 & 2: Comments and RFAI on 2017 Amendment to PWS ODPCP	651.105.180523.ADECrfaiR2.pdf

2018 Minor Amendment

Plan holders:
ATC, BP Alaska, Chevron, Polar Tankers, Crowley, Andeavor

Summary:
On October 19, 2018, the plan holders submitted an application for amendment to the ODPCP and SERVS Technical Manual, the purpose of which was to remove Appendix D, Transition Plan, from the SERVS Technical Manual as the implementation of the Transition Plan had been completed per Condition of Approval 2A of the 2018 plan approval letter. In addition, minor corrections were made to the plan's text and contact information was updated.

On November 9, 2018, ADEC approved the amendment and acknowledged that the required conditions had been met.

Supporting Documents:

ADEC/SPAR/IPP/MVS. (2018) Oil Discharge Prevention and Contingency Plan Basis of Decision.

APSC/SERVS. (2018) SERVS Technical Manual.

Merrell, Geoff. (2018, November 9) Geoff Merrell, ADEC, to Brett Lowe, Polar Tankers, Inc., re: Polar Tankers, Inc. Oil Discharge Prevention and Contingency Plan, ADEC Plan # 16-CP-4038; Minor Amendment Approval, November 9, 2018. (Note: with regards to the joint ODPCP and SERVS Technical Manual, the approval letters to all plan holders were identical.)
20181106PolarMinorAmendApprov with DistList.pdf

Morgan, Monty (on behalf of RPG). (2018, October 19) Monty Morgan, Polar Tankers, to Ron Doyel, ADEC, RE: Application to Amend the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plans (Revision 2), October 19, 2018.
651.300.181019.PWSRPGtkrCPrv2.pdf

RPG. (2018) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan.

Wood, Graham. (2018, June 22) Graham Wood, ADEC, to Karen Hays, Alaska Tanker Company, re: Amendment approval, June 22, 2018. (Note: with regards to the joint ODPCP and SERVS Technical Manual, the approval letters to all plan holders were identical.)
20180622-ATC-ApprovalECOAmend.pdf

2020 Major Amendment

Plan holders:
ATC, BP Alaska, Polar Tankers, Crowley, Andeavor

Summary:
On September 6, 2019, the plan holders submitted an application for amendment to the ODPCP and SERVS Technical Manual, the purpose of which was to make administrative changes to the Tanker C-plan and SERVS Technical Manual. Addendums to the application were submitted to ADEC on September 23 and 24, 2019. ADEC declared the PWS ODPCP sufficient for review on September 26, 2019 and set the public review period to begin on October 2, 2019 and end on November 1, 2019.

The original application included Chevron as a plan holder, but before the amendment was approved, Chevron had withdrawn its State of Alaska vessel response plan and its membership in the RPG.

On November 13, 2019, ADEC sent letters to the plan holders which required that several RFAI be addressed. PWSRCAC had sent to ADEC on December 18, 2019, a letter which expressed concern about the removal of ice scouts from the plan and requested that the topic be addressed in the RFAI. ADEC's final RFAI included, "Please explain that there is no reduction in ice scouting capabilities with the proposed changes to the plan, and provide a description of the ice detection equipment that is currently available or in use on the escorting tugs and tankers."

In their December 2, 2019, response to the RFAIs, the RPG said:

> Due to tides, winds and current, a six-hour-old ice report is of marginal use to the mariner. Improvements in radar over the years have increased the ability of the VTS to see if there are any possible impairments near the shipping lanes in real time. These improvements, along with speed restrictions, the requirement for two Escort vessels, one of which can be an ice scout vessel and the changing condition of Columbia Glacier all justify removal of this requirement. Changes support ice reporting from on scene resources in the vicinity of the transit instead of reports provided up to nine hours previously. As a result, timely and accurate ice information will be reported so the best decisions can be made by professional mariners and COTP. All tankers and escort vessels have state-of-the- art radar as well as high powered searchlights.

On March 3, 2020, ADEC approved the amendment with the following Condition of Approval: "Prior to the publication of the approved plan, include additional information in the Core Plan, Section 2.1.8.2, Ice Navigation Procedures, that commits that an Ice Scout Vessel (ISV) will be part of normal transit procedures in PWS when ice is observed within one nautical mile of the traffic lanes until there is a report that confirms no ice is present."

One issue raised by PWSRCAC during this amendment review process was changes to language in core plan Section 3.9.1 Training Overview. PWSRCAC submitted an RFAI asking for explanations for the changes made which included the removal of job roles to determine training, the elimination of the learning management system to track training, and the removal of specific dates by which an individual's training should be completed. None of PWSRCAC's RFAI was passed on to the plan holders and the suggested changes were implemented into the plan.

Supporting Documents:

APSC/SERVS. (2018) SERVS Technical Manual.

Carey, Anna. (2019, November 13) Anna Carey, ADEC, to Brett Lowe, Polar Tankers, Inc., re: Polar Tankers, Inc. Oil Discharge Prevention and Contingency Plan, ADEC Plan # 16-CP-4038; Request for Additional Information, November 13, 2019. (Note: with regards to the joint ODPCP and SERVS Technical Manual, the letters to all plan holders were identical.)
20191113PolarRFAI.pdf

Morgan, Monty (on behalf of RPG). (2019, September 6) Monty Morgan, Polar Tankers, to Anna Carey, ADEC, re: Application to Amend the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan, Revision 3, September 6, 2019.
651.300.190906.ADECrpgAmndRv3.pdf

Morgan, Monty (on behalf of RPG). (2019, December 2) Monty Morgan, Polar Tankers, to Anna Carey, ADEC, re: Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan, Revision 3, Response to Request for Additional Information, December 2, 2019.
651.300.191202.RPGamnd3RFAI.pdf

RPG. (2018) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan.
Schantz, Donna. (2019, November 1) Donna Schantz, PWSRCAC, to Anna Carey, ADEC, re: Requests for Additional Information on the Proposed Amendment to the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan, ADEC Plan Nos. 16-CP-2222; 16-CP-5192; 16-CP-4038; 16-CP-4039; and 16-CP-4046, November 1, 2019.
651.105.191101.ADECTkrCPCmts.pdf

Schantz, Donna. (2019, December 18) Donna Schantz, PWSRCAC, to Anna Carey, ADEC, re: PWSRCAC Final Comments on the Proposed Amendment to the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan, ADEC Plan Nos. 16-CP-2222; 16-CP-5192; 16-CP-4038; 16-CP-4039; and 16-CP-4046, December 18, 2019.
651.105.191218.ADECTkrCPCmts.pdf

Wood, Graham. (2020, March 3) Graham Wood, ADEC, to Brett Lowe, Polar Tankers, Inc., re: Polar Tankers, Inc. Oil Discharge Prevention and Contingency Plan, ADEC Plan # 16-CP-4038; Plan Approval, March 3, 2020. (Note: with regards to the joint ODPCP and SERVS Technical Manual, the approval letters to all plan holders were identical.)

20200303Polar PWS Approval Maj, Amend, Cert, BOD, DistList.pdf

PWSRCAC Comments:

Date	Communication	Contents	Doc Management
November 2019	Letter to ADEC Division of Spill Prevention and Response	RFAI on proposed amendment (3 pp)	651.105.191101.ADECTkrCPCmts.pdf
December 2019	Letter to ADEC Division of Spill Prevention and Response	Final Comments on Proposed Amendment (3 pp)	651.105.191218.ADECTkrCPCmts.pdf

2020 Minor Amendment

Plan holders:
ATC, BP Alaska, Polar Tankers, Crowley, Andeavor

Summary:
On October 2, 2020, the plan holders submitted an application for amendment to the ODPCP and SERVS Technical Manual, the purpose of which was to amend the plan in accordance with changes to the USCG guidelines for dispersant operations. According to the application letter, "These revised guidelines, which go into effect January 1, 2021, necessitated a change of the contract provider for large aircraft dispersant application. Also included are administrative updates to the PWS Tanker ODPCP."

After deeming the proposed changes as constituting a minor amendment, ADEC approved the amendment on December 2, 2020. The approval letter listed revisions in four areas:

1. Updates to the Polar Tankers Inc. Vessel Response Plan and Shipboard Oil Pollution Emergency Plan (VRPSOPEP), Core Plan and SV-140 with new service provider for fixed-wing aerial dispersants in PWS and equipment descriptions, effective date January 1, 2021;
2. Updates to service provider for fixed-wing spotter aircraft to support dispersant application, effective date January 1, 2021;
3. Updates with new Fort Liscum self-propelled skimmer information;
4. VRPSOPEP updates including Administrative updates to Vol. 1 and Vol. 2 including the Table of Contents, Revision History, page footers and section identification information; updates to contact information for QIs and dive contractors; updates to clarify descriptions in Vol. 1 and Vol. 2; updates to Safety information in Vol. 1 to clarify PPE descriptions.

Supporting Documents:

APSC/SERVS. (2018) SERVS Technical Manual.

Morgan, Monty (on behalf of RPG). (2020, October 2) Monty Morgan, Polar Tankers, to Anna Carey, ADEC, re: Application to Amend the Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan, Revision 4, October 2, 2020.
651.300.201008.RPGrsbmtRev4.pdf

RPG. (2018) Prince William Sound Tanker Oil Discharge Prevention and Contingency Plan.

Smith, Crystal. (2020, December 2) Crystal Smith, ADEC, to Brett Lowe, Polar Tankers, Inc., re: Polar Tankers, Inc. Oil Discharge Prevention and Contingency Plan, ADEC Plan # 16-CP-4038; Minor Amendment Rev. 64 Approval, December 2, 2020. (Note: with regards to the joint ODPCP and SERVS Technical Manual, the approval letters to all plan holders were identical.)
20201202.Polar.Rev.64.Approval.Minor.Amend.pdf

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Prince William Sound **TANKER PLAN HISTORY**

1976
- First APSC Oil Spill Contingency Plan completed; approved in 1977

1977
- First Alaska oil spill contingency planning requirements enacted
- Federal government approves APSC plan

1989
- PWSRCAC incorporated (contract with APSC signed in Feb 1990)
- ***Exxon Valdez*** Oil Spill
- ADEC Emergency Order requiring improved response plan

1990
- Oil Pollution Act passed
- Alaska law enacted with revised contingency planning requirements

1993
- Anvil Corporation *Oil Spill Response Plan and Mass Balance Study*

1994
- ***Eastern Lion*** oil spill
- ADEC plan review guidelines developed
- Disabled Tanker Towing Study #1

1995
- First approval under new regulations (AL, BAT, ET, NS, RE, SAP, S, TR, W)
- 1995 Plan Adjudication (BAT, ET, SAP)

1999
- Renewal (B, ET ,FV, SAP, S, TR)
- Copper River Delta Oil Spill Trajectory Analysis and Agreement (1995 COA 8) (C, NM, SAP, S, TR, W)
- Gulf of Alaska Response Agreement

1998
- Adjudicatory Hearing re: 1995 Plan Approval on Phasing and Copper River (BAT, S)
- Tanker Escort Improvements (1995 COA 2) (BAT, ET, RE)

1997
- Enhanced Escort System Task Force *See 1998 Tanker Escort Improvements*
- Sea trials with Protector Class tugs *See 1998 Tanker Escort Improvements*
- BAT regulations revised (BAT)

1996
- Near Shore Response Plan (1995 COA 3) (B, FV, L, NS, RE, TR)
- ESA's for PWS, Kodiak, and Kenai Penninsula (1995 COA 5) (TR, W)
- Supplemental Data for PWS Air Logistics Study and Water Cargo Transportation into Kodiak and Cordova (1995 COA 4) (NM, RE, TR)
- Wildlife Training and Otter Hospital Compliance Schedule (FV, PN, TR, W)
- Recreational areas in PWS (1995 COA 6) (SAP, TR)
- PWS Risk Assessment

2000
- Disabled Tanker Towing Study #2 *See 2001 Major amendment* (ET, TR)
- Geographic Response Strategy (1999 COA 3) (C, SAP, TR)
- Major amendment (1999 COA 6) (FV, RE, TR)
- Minor amendment (1999 COA 5) (B, C, L, RE)
- Minor amendment (1999 COA 6) (FV, TR)
- Reporting of Tanker Casualty (1999 COA 9) (ET)
- Scenario Workgroup (1999 COA 4) (PN, RE, S)

2001
- Major amendment (1999 COA 8) (BAT, ET, S, TR)

2002
- Renewal (BAT, C, ET, NS, PN, S)

2003
- Statute extends length of plan approvals from 3 to 5 years

2004
- RMROL regulations amended (RMROL)
- Hinchinbrook Entrance tug arrest exercise (ET)

2005
- Five minor amendments (NM, RE)

2012
- Renewal (BAT, FV, L, NS, PN, RMROL, SAP , TR)
- Alaska North Slope Crude Properties Work Group (OP)

2011
- Nearshore exercise - full nearshore deployment (FV, NS, TR)
- Nearshore Response Workgroup (FV, NS, RE, TR)

2010
- Fishing Vessel workgroup (FV, PN, TR)
- Nearshore exercise - full nearshore deployment (FV, NS, TR)

2009
- Wildlife Task Force Exercise (W)
- Alaska North Slope Crude Properties Work Group (OP)
- Crucial Skimmer Test Work Group (RE)

2008
- PWS Steering Committee *See 2007 Renewal*
- Personnel workgroup (PN, TR)
- Dispersants Aerial Support Workgroup (AL, NS)
- Minor Amendment (BAT)

2007
- Renewal (AL, BAT, FV, NS, NM, PN, RE, RMROL, SAP, S, TR, W)

2006
- Two minor and one major amendment (FV, L, NS, RE, TR)

2016
- ADEC plan review guidelines revised

2017
- Renewal (B, BAT, FV, L, NS, NM, OP, PN, RE, RMROL, SAP, S, TR)

2018
- Major amendment (B, ET, PN, TR)
- Minor amendment (ET)

2020
- Major amendment (ET, RE)
- Minor amendment (AL, RE)

= Renewal or Amendment
= Work Group or Report
= Exercise
= Legal Action
= Regulatory Change
= Summary not included

AL	=	Air Logistics
B	=	Barges
BAT	=	BAT
C	=	Contracts/MOU/MOA
ET	=	Escort Tugs
FV	=	F/V Program
L	=	Lightering
NS	=	Nearshore
NM	=	Non-mechanical
OP	=	Oil Properties
PN	=	Personnel Numbers
RE	=	Response Equipment
RMROL	=	RMROL
SAP	=	SAP/GRS
S	=	Scenarios
TR	=	Training
W	=	Wildlife

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