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ADEC to shippers: Beef up tanker escorts through Valdez Narrows

Shippers of North Slope crude oil must improve the escorts for large tankers going through Valdez Narrow in the winter months, as a condition for gaining approval of their tanker oil spill contingency plans. Shippers cannot operate in state waters without approved plans.

Under a proposed decision by the Alaska Department of Environmental Conservation (ADEC), the shippers must submit proposals for improvements to be in place by October 1. However, that date may slip because of appeals on other aspects of the tanker contingency plans.

The needed improvements could be made by changing escort operations and procedures, or by using different escort vessels. The purpose of the improvements is to enhance the ability of escort vessels to rescue a disabled tanker and thereby prevent an oil spill.

"The presence, capability and dependability of tanker escorts are of the utmost importance in preventing oil spills in Prince William Sound," the ADEC said in its findings. The Department also found that current knowledge about existing escort capabilities “suggests a very large crude carrier could not be saved in the Valdez Narrows” in high winds and seas.

A two-year study completed in 1994 revealed new information about the limitations of escorts that had been in place. Through computer simulations, the Disabled Tanker Towing Study (DTTS) demonstrated changes that would improve the ability of escorts to rescue a disabled tanker in different areas of the transit, including the Valdez Narrows.

In 1994, the shippers made operational changes in the tanker escorts, based on the findings of the DTTS and in anticipation of imminent changes in the federal escort requirements. Through the Valdez Narrows, the shippers slowed tankers from 6 knots to 5 knots and attached a tug, one of the escort vessels, to the stern. While that solution satisfied the new federal requirements, the ADEC has concluded that it does not satisfy the state requirement for best available technology.

"The Department concludes that escort performance improvements are available, can be obtained and readily applied to assist very large crude carriers transiting the Valdez Narrows," the decision said.

Continued on Page 2
Volunteer Profile: Kendrick finds work therapeutic

There are many different triggers that motivate volunteers, but a common thread among many – it is not most – RCAC volunteers is the Exxon Valdez oil spill. For Suzie Kendrick of Soldotna, being a volunteer on RCAC’s Terminal Operations and Environmental Monitoring (TOEM) Committee has a healing effect.

"I look at my involvement in RCAC as part of therapy in continuing recovery from the spill," Kendrick said. "For me, it’s not just about public service. It’s helping me work through some of the residual pain and anger from the spill. It’s a constructive outlet for negative feelings."

Kendrick moved to Alaska in 1980 from a small town in Northern California, after spending several summers here while in college. With degrees in microbiology and chemistry under her arm, she settled in Soldotna. She worked as a medical technologist for three years, then as a lab technician with Tesoro refinery for five years.

Kendrick and her husband, Doug Heimbuch, had fished in Cook Inlet, False Pass and Bristol Bay when they turned to Prince William Sound. Their first year of drift gill-netting in the Sound was 1986.

"Buying a permit in the Sound was a major life decision. We put all of our eggs in that basket. A month before our second season was to start, it happened. The oil spill was a life-changing event. Of all the devastating events in my life, it was right up there."

Kendrick is a relative newcomer to the TOEM Committee – she was appointed in March ’94 – but she jumped in with energy. Her focus has been on environmental monitoring and she has a particular interest in the federal permit that governs discharge of treated effluent from Alyeska’s Ballast Water Treatment Facility at the terminal.

"One of my main goals right now is for the next permit to allow the public some degree of assurance of continued protection and monitoring of the environment," Kendrick said. "I’d like to see caged mussel studies near the effluent outfall in Port Valdez. I think that would give us some indication of the extent of bioaccumulation that’s occurring, if any."

Kendrick sees herself as something of a radical. She gets a bit discouraged at times, when the FCAC Board of Directors sometimes takes a direction she doesn’t agree with. "But, it just makes me determine to hang in there," she said. "There’s room at RCAC for a lot of different viewpoints."

Kendrick sees RCAC as a means for citizens to work with and speak directly to regulatory agencies. "I feel like my voice can be heard in a meaningful forum," she said. "I can stand up in a meeting with the Environmental Protection Agency and be the only citizen there with no stake except that the spill affected me. The average citizen doesn’t get to be heard by the EPA." She pauses. "It’s almost a privilege to be involved."

Ferry takes new position

Leann Ferry has been promoted to Project Manager in the Valdez office. Ferry had been Program Assistant for the Terminal Operations and Environmental Monitoring (TOEM) Committee.

In her new position, Ferry manages projects that cross committee lines, including issues related to fire response on tankers and at the terminal. She will take a more active role in the RCAC Emergency Response Team and work with representatives of Alyeska, shippers and regulatory agencies. Ferry will continue on a temporary basis to manage the ballast water influent monitoring program that RCAC is conducting jointly with the Alaska Department of Environmental Conservation.

Prior to joining RCAC in January 1993, Ferry was a paralegal with an Anchorage law firm. Originally from Sacramento, California, Ferry has a bachelor of arts degree in biological science from the University of California, Davis. She came to Alaska in 1990. Ferry’s hobbies include skiing and biking, martial arts, reading, knitting and her dog, Buddy.

Kendrick asks to plug the RCAC staff working with the TOEM Committee. "Without the staff, the committee is nothing. You can’t form opinions without information. Our ability to contribute really hinges on the staff support. Without them, we couldn’t keep up on the issues."

Report on TAPS tankers available

A report on TAPS-trade tankers relative to oil spill prevention will be available in October from RCAC. The 32-page report, "Oil spill prevention: Improvements in tanker safety in Prince William Sound," presents RCAC’s perspective of changes that have made tanker transportation safer. The report also discusses areas where RCAC believes improvements should be made.

Tanker oil spills have a number of different causes, among them human error, structural failure, mechanical failure, or severe weather and sea conditions. Major oil spills typically stem from a combination of factors. This report examines the safety of tanker traffic through Prince William Sound by addressing many of the factors that contribute to oil spills, and conversely, factors that help to prevent them.

"Oil Spill Prevention: Improvements in Tanker Safety in Prince William Sound" can be viewed as a starting point for a major study now underway on the risks of tanker transportation in Prince William Sound. The Risk Assessment is a joint effort of industry, citizens and regulatory agencies.

To obtain a copy of "Oil Spill Prevention: Improvements in Tanker Safety," call or write the RCAC office in Anchorage.

Escort improvements required

Continued from Page 1

The escort improvements are an interim measure, pending a study now in progress that is expected to shed more light on, among other things, the risks associated with tanker escorts and corresponding mitigation strategies. That study, the Prince William Sound Risk Assessment Project, is a joint effort of shippers, Alyeska, RCAC, ADEC and the U.S. Coast Guard. It is expected to be completed in the spring. ADEC is also requiring that the shippers propose escort improvements based on the final report of the Risk Assessment.

The interim escort improvements are to be in place from October 1 through March 30, 1996, and apply only to tankers of more than 190,000 DWT.
Air and water

EPA issues final rule on vapor controls at terminal

Beginning in February, 1998, most of the 40,000 tons of volatile organic compounds emitted during tanker loading at the Valdez Marine Terminal each year will no longer be released into the atmosphere, under a long-awaited federal rule finalized Sept. 6. The rule promulgated by the U.S. Environmental Protection Agency (EPA) implements pollution controls mandated by Congress in the 1990 Amendments to the Clean Air Act. The Clean Air Act Amendments require that large marine terminals install controls to reduce air pollution from the loading of petroleum or petroleum products. The EPA rule spells out details, such as percentages of reduction and timetable for complying.

The release of the final rule marks the close of what had been a turbulent issue for RCAC and Ayleska. In the early 1990s, RCAC and Ayleska clashed over conflicting studies regarding the fate of toxic vapors released at the terminal. More recently, however, RCAC and Ayleska worked together in discussions with the EPA to develop solutions.

"We had some tough times on this issue. It’s a great relief to have it finally resolved," RCAC board member Stan Stephens said. Stephens has been very active on the vapor control issue and worked closely over the past year with Norm Ingram, Ayleska’s Vapor Control Manager.

"I give Norm a lot of credit. He bent over backward to keep us in the loop in discussions with EPA and state regulators," Stephens. "The end result is that it’s fair to everybody, especially the residents of Valdez. I’m pleased with the outcome."

“...it’s a great relief to have it finally resolved...The end result is that it’s fair to everybody, especially the residents of Valdez...”

Stan Stephens

During tanker loading in Valdez, organic vapors containing benzene and other hazardous pollutants are released directly into the environment. Approximately 500 tons of benzene are emitted at the terminal each year, down from 450 tons a year in the early 1990s. The amount of vapors corresponds in part to oil throughput—less throughput means less hazardous vapors. Another factor in the drop in benzene emissions is that the crude now has a higher proportion of natural gas liquids, which contain relatively small amounts of hazardous air pollutants.

Ayleska will have vapor control systems up and operating at two of the loading berths by February 1998. Ayleska will be permitted to operate other berths without vapor controls, but the amount of crude loaded through those berths will be limited. Use of the uncontrolled berths will decline each year and they will be shut off at all after 2010.

Some of the capped vapors will be used as fuel for power generation and as blanket gas in the terminal’s holding tanks. The remaining vapors will be incinerated. At other terminals, all loading berths must have vapor controls installed within four years. Ayleska is not required to install controls at all berths because it is regulated under a separate category. However, because the vapor controls at the Valdez terminal will be in operation 18 months earlier than those at other terminals, those will be greater pollution reduction than if it had been regulated like other terminals.

Under an earlier draft of the rule, Ayleska would have had to install vapor controls on all the loading berths. Ayleska convinced EPA — and RCAC — that decline in total throughput will mean a steady drop in the amount of oil loaded through the uncontrolled berths and that the potential for pollution reduction at the less-used berths would not justify the $30 million cost of installing controls on an additional berth. Ayleska estimates it will cost $93 million to install controls at two berths. Because oil will continue to be loaded through one or two berths without vapor controls, air pollutants will be reduced 84 percent in the first year the controls are operating. As the uncontrolled berths are used less and less, the percentage of air pollutants captured will increase.

RCAC originally opposed Ayleska’s proposal for controls on only two berths, but came around when Ayleska offered to have the vapor controls operating at the two berths two and a half years after the rule is finalized. Other terminals have four years to comply. Having controls at two berths sooner yields greater reduction in air pollution than waiting four years for controls at all berths, according to calculations by an RCAC consultant.

With controls at two berths, hazardous air pollutants will be reduced 90 percent over the 12 years from 1998 to 2010. That compares to an 81.5 percent reduction over the same period, if EPA had required Ayleska to install controls at all berths. The difference means an additional 3,100 tons of hazardous air pollutants will be captured over those 12 years. After 2010, when uncontrolled berths are no longer used at all, pollution will be reduced 98 percent. Benzene, the chief air pollutant of concern from the Ayleska terminal, causes cancer in humans.

The rule contains safeguards to ensure pollution control even if new oil discoveries come on line. If the amount of oil loaded through uncontrolled berths exceeds limits set in the rule for 1995 through 1997, even before the controls are operating. The reason is that EPA’s decision to allow use of berths without vapor controls hinged on the expectation of overall declining throughput. Beginning in 2011, no oil will be loaded through uncontrolled berths. By then, throughput should be low enough that only one controlled berth is used routinely; the other controlled berth would be used for maintenance back up.

Questions about pollution in Port Valdez examined from new angle

In an effort to assess the environmental impacts of effluent from the Ballast Water Treatment Facility (BWTF) relative to impacts from other pollution discharges into Port Valdez, scientists sponsored by RCAC and Ayleska are tackling the issue from a broader perspective. In the past, the focus of research has been directed primarily at the BWTF, researchers from Western Washington University and the University of Alaska Fairbanks are looking at all the sources of pollution in Port Valdez.

The so-called "Ecological Risk Assessment" of the port will provide perspective about the present and potential impacts of pollutants from the BWTF by looking at all of the ecological risks and their potential impacts. Other known sources of pollution in Port Valdez include three fish processors, two sewage treatment plants, the small boat harbor and storm drain run-offs.

The research team will not conduct any new field work, however. One of the attractions of this ecological risk assessment is a relative wealth of existing data, according to researchers at Western Washington University. The researchers hope to crunch that data to draw out new information. The project is being funded and managed jointly by RCAC and Ayleska.

Ultimately, the goal of the risk assessment is one that RCAC has long sought: to get a clearer, more definitive picture of the extent of ecosystem problems, if any, that exist in Port Valdez and whether they are caused by pollution from the Valdez Marine Terminal.

Phase one of the project is to formulate the problem by identifying what is at risk and how to measure that risk. Instead of trying to study everything that might be at risk from pollution, the researchers will narrow down what to study based on economic, social and biological value. For example, salmon reproduction would be an ecosystem component important to commercial fishing and thus of significant economic value, while organisms low on the marine food chain would have biological value.

Once these so-called "assessment end points" — the things you want to protect from risk — have been identified, the next step is to identify how to measure the potential impacts on those end points. Public comment will be solicited about suspected sources of pollution.

Phase two of the project is risk analysis. In this phase, the scientists analyze and quantify the existing and potential risks from different pollution sources, and provide a comprehensive assessment of the potential effects of various pollution sources, including the relative severity of risk from those sources.

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Response and planning

ADEC approves tanker oil spill plans with conditions; Cordova and Kodiak appeal for additional changes

Alyeska and shippers’ plans for preventing and responding to oil spills from TAPS-trade tankers will be approved, with conditions, but when is unclear because of appeals. In mid-August, the Alaska Department of Environmental Conservation (ADEC) issued a proposed decision to grant conditional approval to the 21 contingency plans for tankers that carry crude oil through Prince William Sound. Shippers must have approved plans in place in order to operate in state waters.

The Kodiak Island Borough and the City of Cordova appealed the decision on grounds that the plans should have responded and protection strategies for a hatchery in Kodiak, and the Copper River Delta and Flats, respectively. As of early September, state officials were developing proposals in an effort to address the Kodiak and Cordova concerns.

The Kodiak Island Borough wants the tanker contingency plans to include a protection plan for Kiti Bay Hatchery on Aftonak Island. The proposed decision by ADEC recognizes the economic value of the Kiti hatchery but does not require the southbound shippers to include a hatchery protection plan in their contingency plans. However, ADEC would require Tesoro Alaska to consider the impact of its operations and a potential spill on the Kiti Bay Hatchery, as a condition of its plan approval. Unlike the other shipper, Tesoro routinely transits Kennedy Entrance and Stevenson Entrance, between the Kenai Peninsula and Kodiak.

The appeal by the City of Cordova is based on ADEC’s decision not to require scenarios for responding to spilled oil in the Copper River Delta. In an earlier draft of its proposed findings, ADEC said it would require those scenarios. The department subsequently concluded that any spill affecting the Copper River Delta would originate outside state waters, and thus fall outside ADEC’s jurisdiction. The City of Cordova says that conclusion is incorrect, because the currents are always of a westerly set, which would carry spilled oil away from the Copper River Flats. The City of Cordova countered that the currents can switch to a stronger easterly set, which would carry oil onto the flats.

“The need to protect the Copper River Delta and Flats cannot be stressed enough,” Cordova Mayor Margy Johnson wrote in the City’s appeal. “As ADEC acknowledged in its decision packet, this is an environmentally sensitive area and an area of public concern. It is of tremendous importance to a vast number of Alaskans, including commercial fishermen, subsistence users, sportmen, bird watchers, recreational users, and marine mammal viewers. It is an unlike any other area and hosts the largest migratory shorebird and waterfowl wetlands in the Northern Hemisphere.”

The appeal process could result in up to two or three months’ delay in final approval of the tanker contingency plans. Once the plans are formally approved, they will be in effect for three years.

ADEC proposes to grant conditional approval to the 21 tanker contingency plans. Among the conditions is a directive that the shippers improve the performance of escorts that accompany large tankers (more than 190,000 DWT) through Valdez Harbor during the winter months. The ADEC would not order the ships to use a tractor tug, but that is one of the options that would fulfill the requirement (See story, page1). Other proposed conditions of approval include:

- Immediate notification of any changes in shippers’ contractual relationships with response contractors hired to conduct spill response on the shippers’ behalf.
- More information to demonstrate various aspects of nearshore response, which uses small task forces to corral and recover spilled oil before it hits shore.
- More information on availability of air cargo transportation during peak holiday seasons, and evaluation of water cargo transportation into Kodiak and Cordova.
- Shippers must state by Nov. 30, 1995, when they will finish identifying sensitive areas and areas of public concern for the Prince William Sound, Kodiak and the Kenai Peninsula areas.
- Shippers must identify primary recreational use areas within Prince William Sound, and develop provisions in the contingency plan to minimize intrusion on remote recreational users.
- Shippers must submit by Sept. 29, a schedule for completing development of training programs for handling wildlife.

The dates listed may change depending on when ADEC’s decision becomes final.

The process for reviewing the tanker contingency plans has been long and sometimes contentious. After the Exxon Valdez oil spill in 1989, the rules regarding oil spill contingency plans changed dramatically. Before, the State of Alaska required only Alyeska Pipeline Service Co. to file a contingency plan for spills from tankers transiting Prince William Sound. While ships had their own response plans, they were not required to file geographic-specific plans.

This was the first time that individual tanker plans have been formally submitted and reviewed under the post-1989 laws and regulations. The review began in March 1994, when shippers submitted their plans to ADEC. In March and April 1995, ADEC conducted workshops and public hearings in Valdez, Homer, Kodiak, Cordova and Anchorage.

RCAC, with the assistance of contractors, conducted intensive reviews of the tanker plans and submitted comments at different stages of the review process.

The new rules require each TAPS trade tanker to file a plan with extensive detail about the equipment, procedures and personnel that will be mobilized in the event of an oil spill. Although Alyeska still provides the initial response to a tanker spill anywhere in Prince William Sound, it does so now on behalf of the responsible party. Each contingency plan contains three sections: steps taken to prevent an oil spill, initial response, and long range response.

One of the 21 contingency plans is the so-called “Core Plan,” the initial response by Alyeska to any tanker spill in the Sound. The Core Plan is the same for all TAPS-trade tankers. The other 20 plans are the individual plans prepared by shippers for their tankers.

The individual plans include prevention measures and long range response that would come into play when the tanker responsible for the spill takes over the response efforts from Alyeska.

Verdict still out on presence of spilled oil deep in Sound

Samples of deep sediments were taken in July near Knight Island to determine whether oil spilled from the Exxon Valdez sank and accumulated on the seafloor. There was no visual evidence of oil in the sediment samples. Laboratory analysis is needed to determine whether oil from the 1989 spill is present at the sites sampled. The lab results were expected to be available by late September.

RCAC commissioned the special sampling because of anecdotal reports by fishermen of oil in their nets. Curiosity was further piqued by information about the fate of oil spilled in the Braid incident of 1993.

In the case of the Braid, which dumped 20 million gallons of light crude off the Shlettland Islands, data indicate that approximately 30 percent of the oil went to the bottom in a 30-mile radius. Episodes of high energy wind and wave action followed both the Braid and Exxon Valdez oil spills.

The sampling was conducted July 15-17, at six sites around Knight Island, which was heavily hit by the 1989 spill. The sediments samples, taken by gravity core, were about four inches wide and one-half meter to one meter long. They were taken from water depths of 175 meters to 695 meters. If oil is found in the sediment samples, laboratory analysis can determine whether the oil has the same “fingerprint” as the Exxon Valdez cargo.

Information about the fate and effects of oil spilled from the Exxon Valdez would be useful in the event of any future spills.
Alyeska gives Ayleska public service award

The new Commander of the 17th District for the U.S. Coast Guard, Rear Admiral Ernest Riutta, presented Alyeska Pipeline Service Company with a public service award in Valdez for its assistance in the rescue of the cruise ship, Regent Star, on July 22.

Alyeska's Ship Escort Response Vessel System (SERVS), with its contracted vessels and crews from Tidewater Marine Alaska and Crowley Marine Services, was instrumental in rescuing the 850-foot cruise ship when a fire on board rendered it without power in Knight Island Passage in Prince William Sound. Approximately 1,000 passengers and crew were on the Regent Star. It was slowly drifting toward a reef 1,200 feet to the east when the first Alyeska vessel arrived on the scene from its station at Naked Island in response to the ship's MAYDAY call.

Passengers were shuttled to the Rotterdam, another cruise ship that responded to the emergency, while Alyeska's SERVS vessels kept the Regent Star safe. Once the passengers were safely disembarked, with Tidewater's Dr. Jack towing Crowley's tugboat Stawart tethered to the stern and Tidewater's Pioneer Service escorting the Regent Star with its crew onboard was towed to Whittier.

"We appreciate the expert assistance of Alyeska and its contractors in this rescue," said Riutta. "Alyeska also made fire-fighting equipment available to us and responded very effectively." SERVS Manager Tim Plummer added that initially Alyeska responded to the MAYDAY call, but its continued assistance was under the direction of the Coast Guard. Plummer said Alyeska "will never ignore or wait around to respond to a MAYDAY call. When a ship's captain makes that call, it means the ship is in serious trouble and immediate help is needed.

Alyeska to meet EPA vapor control deadline

OM&S, Marine teams merge at terminal

A merger between the Oil Movements and Storage Team and the Marine Team has created the biggest business team at the Valdez Marine Terminal. Approximately 50 members of the new Oil Movements Team (OMT) are busy taking up residence in the Emergency Response Building.

OMT Team Leader John Baldridge says he expected the team to be consolidated under one roof in "the old SCADA area" of the ERB by the end of August.

Operating with two lead technicians, one for berth operations and one for metering and tank farm areas, the OMT has formed a work group to iron out the details of the merger. In addition to Baldridge, members of this work group include Ellis Fall, Don Beck, Doug Fleming, Randy Algoog, Jeff Kelly, Vaughn Bedford, Rich Chaffin, Scott Westover, Nancy Hartley, Joel Williams and Lori Greene.

A cross-training plan has been implemented with berth operators from each shift being trained for the tank farm areas under the direction of Williams. The next step will be to train and qualify additional personnel in berth operations.

"The cross-training will go on indefinitely," says Baldridge. "Cross-utilization of personnel will always be our focus."

Baldridge also said operations involving tanker movements and tugboats are now the responsibility of SERVS. OMT's operations include all areas on the terminal except the Ballast Water Treatment and Power Vapor facilities.

"We also coordinate fuel deliveries to the terminal and operate the Petro Star Valdez metering skid that delivers crude oil to the refinery and puts back the residual oil into the pipeline," Baldridge said.

He said some personnel could be reassigned within the team as a result of the merger, but no one will be laid off.

"Due to attrition, the people who were displaced found positions elsewhere within the company. Some of the unfilled technician vacancies on the team will not be filled," Baldridge added.

SeaRiver to test elements of oil spill response plan

SeaRiver Maritime, Inc. gets its turn to take center stage this year during the annual major oil spill drill in Valdez. Every September, one of the major TAPS trade shippers conducts a large-scale exercise to test some of the people, systems and equipment that would be mobilized if a big spill occurs.

The drill will be held Sept. 18-20, at the new Valdez Emergency Operations Center. This will be the first major drill at the new VEOC. In the past, they were held at the Valdez Civic Center.

High up on the list of goals for the drill is exercising the logistics and mobilization of people and equipment, including equipment from outside the Prince William Sound Area. In the event of a catastrophic spill, a shipper would have to obtain response equipment from outside the area in order to contain and clean up the oil. SeaRiver will test its ability to do that.

Another important aspect of the drill will be the transition of response management from Alyeska to SeaRiver. Alyeska would be the initial responder to any tanker spill in Prince William Sound. The shipper responsible for the spill would take over the response from Alyeska. A smooth transition is important to maintain the most effective continuous response effort.

SeaRiver will also mobilize its Emergency Response Team and its Marine Casualty Team, from Houston. The job of the latter group is to salvage a vessel and prevent more oil from spilling.

The drill will also test SeaRiver's initial on-scene commanders and its Community Relations Plan. Nearly 300 people are expected to participate in the drill. Most will be from SeaRiver and Alyeska, but RCAC, the Alaska Department of Environmental Conservation and the U.S. Coast Guard will also participate.

The State of Alaska requires a major drill of spill response in Prince William Sound every year. The 1994 drill was conducted by ARCO Marine, the year before, it was done by BP.
Coast Guard certifies RCAC another year

The U.S. Coast Guard has recertified RCAC as the alternative voluntary advisory group for Prince William Sound, pursuant to the Oil Pollution Act of 1990 (OPA 90). RCAC and its sister organization in Cook Inlet must be recertified every year to ensure they are meeting the goals and intent of OPA 90.

OPA 90 established two pilot projects for citizen advisory groups for oil terminals in Prince William Sound and Cook Inlet. The law allows an existing organization to be the advisory group so long as it satisfies certain criteria. Both the Prince William Sound and Cook Inlet RCACs are certified as alternative voluntary advisory groups.

"Our evaluation of your application and supporting comments indicates that the RCAC has put forth a commendable effort during the past year to build positive relationships with industry and government," Rear Admiral James C. Card wrote in his letter of certification.

"The process of bridging the gap between the RCAC and industry is an evolving one which will take time, and considerable effort to create the respect and trust that is envisioned by OPA 90. Therefore, I expect the RCAC to work diligently toward reaching this goal."

Each year, the Coast Guard assesses whether the RCAC fosters the general goals and purposes of OPA 90 and is broadly representative of the communities and interests as envisioned under OPA 90. This year, the Coast Guard received 19 letters supporting recertification of RCAC without reservation, and one letter that did express reservations. The RCAC was originally certified in 1991 and has been recertified annually since then.

-RADM Card, USCG

Publications, reports available

Copies of most documents are available to the public free of charge. A handling fee will be charged for unusually large documents and for requests of more than 10 documents. The following are recent publications and reports.

Publications
- 1994 RCAC "Year in Review." (Ref. #5.9.511.34)

Consultants' Reports
- Fifth Survey Report, Long Term Environmental Monitoring Program. Author: Kinetic Laboratories, Inc. 4/28/95. (Ref. 4.4.42024)
- "Disabled Tanker Towing Study: Aquamaster Data Consultant Review." Consultant: George Randall. March 17, 95. (Ref. 4.3.5.3015)
- "Drill Monitoring Contractor Annual Report - 1994." Author: Tim Jones. Jan. '95 (Ref. 4.2.02060)

Advice & Comments (1995)
- Volume 1, Comments to ADEC on the PWS Tanker Spill Prevention and Contingency Plans and ADEC's Draft Findings, 5/19/95. (Ref. A/C #22.2.2547)
- Volume 2, Comments to ADEC on the PWS Tanker Spill Prevention and Contingency Plans and ADEC's Draft Findings, 5/31/95. (Ref. A/C #22.2.2548)
- Comments to ADEC regarding response to request for comments on water quality standards and petition filed by the Sierra Club Legal Defense Fund. 4/19/95. (Ref. A/C #1530)
- Supplemental comments to EPA on proposed rule for marine tank vessel loading. 4/19/95. (Ref. A/C #1532)
- Comments to U.S. Coast Guard on TAPS vessel owners and operators OPA 90 Alternative Compliance Plan for Gulf of Alaska. 3/22/95. (Ref. A/C #2546)
- Request to Alaska Division of Governmental Coordination for additional information on the Valdez Marine Terminal Contingency Plan. 3/19/95. (Ref. A/C #2542)
- Request to ADEC to suspend use of corrosion inhibitors in the pipeline pending determination of the cause of a tank leak and comments on toxicity testing. Jan. 16, '95. (Ref. A/C #1.2.1028)
- Comments to ADEC on the Prince William Sound Tanker Oil Discharge and Response Plan, regarding availability of spill response equipment from outside the area. Jan. 13, '95. (Ref. A/C #22.2.2544)